



Des Gillen President BP-Husky Refining LLC 4001 Cedar Point Road Oregon, OH 43616 P 567.698.4529 des.gillen@se1.bp.com

City of Toledo
Division of Environmental Services
348 S. Erie Street
Toledo, OH 43604
Attn.: Peter Park

RE: CMS Summary & Data Assessment Report – 1st Quarter 2022

Dear Sir or Madam:

Attached is the CMS Summary Report and Data Assessment Report for BP-Husky Refining LLC for the period of January 1, 2022 through March 31, 2022.

#### CMS Summary Report (Attachment A)

A complete list of emissions units and pollutants monitored are in Table 1; Summary Reports are included in Attachment A. Excess Emissions and Monitoring Systems Performance Report is not required under 40 CFR 60.7(d) if the total duration of excess emissions is less than 1% and the CMS downtime is less than 5% of the total operating time for the quarter. Unless where noted in Table 1, these criteria were met for the units listed.

Table 1. Emission Units and Pollutants Monitored

Location/Emission Unit	Parameter	Quarter 1 2022 Downtime (% unit operating time)	Notes
TIU Fuel Gas Mix Drum			
- B015 - Crude 1 Furnace		0.2	
- B017 - Coker 2 Furnace		0.2	
- B019 - Crude Vac 2 Furnace	]	0.2	
- B022 - Naphtha Treater Furnace	]	0.2	
- B029 - DHT A-Train Furnace	1	0.2	
- B030 - BGOT Furnace	H₂S in Fuel Gas	0.2	
- B031 - Vac 1 Furnace	Gas	0.2	
- B032 - Coker 3 Furnace	]	0.2	
- B033 - East B-GOT Furnace	1	0.2	
- B034 – East Alstom Boiler	1	0.0	
- B035 – West Alstom Boiler	1	0.2	
- P007 - FCC/CO Boiler		0.2	

#### CMS Summary & Data Assessment Report – 1Q2022

Location/Emission Unit	Parameter	Quarter 1 2022 Downtime (% unit operating time)	Notes
TIU Fuel Gas Mix Drum			
- B015 - Crude 1 Furnace		1.2	
- B019 - Crude Vac 2 Furnace		1.2	
- B022 - Naphtha Treater Furnace		1.2	
- B029 - DHT A-Train Furnace	Total Sulfur in	1.2	
- B030 - BGOT Furnace	Fuel Gas	1.2	
- B031 - Vac 1 Furnace		1.2	
- B032 - Coker 3 Furnace		1.2	
- B033 - East B-GOT Furnace		1.2	
- B034/B035 – East & West Alstom Boilers		1.1	
East Side Fuel Gas Mix Drum			
- B008 - Iso 2 Feed Heater	H₂S in Fuel	0.2	
- B009 - Iso 2 Stabilizer Reboiler	Gas	0.2	
- B010 - Iso 2 Splitter Reboiler		0.2	
B036 - Reformer 3 Furnace	H₂S	0.6	
P003 - East Flare (see note A)	H <sub>2</sub> S	1.6	
P003 - East Flare	Total Sulfur	2.4	
P004 – West Flare Vent Gas (see note A)	H <sub>2</sub> S	2.5	
P004 – West Flare "C-Valve" Vent Gas	H <sub>2</sub> S	0.2	
P004 – West Flare Vent Gas	Total Sulfur	1.5	
P004 – West Flare "C-Valve" Vent Gas	Total Sulfur	1.2	
B036 – Reformer 3 Furnace	NOx	0.0	
P007 – FCCU/CO Boiler Bypass (see note B)	CO	0.0	>1% EE
P007 – FCCU/CO Boiler Bypass (see note B)	NOx	0.0	
P007 – FCCU/CO Boiler Bypass (see note B)	SO <sub>2</sub>	0.0	
P007 – CO Boiler Exhaust	CO	0.5	
P007 – CO Boiler Exhaust	NOx	0.5	>1% EE
P007 – CO Boiler Exhaust	SO <sub>2</sub>	0.5	
P009 - Sulfur Recovery Unit with #1	SO <sub>2</sub>	0.0	
P037 - Sulfur Recovery Units #2 & #3	SO <sub>2</sub>	2.8	>1% EE
B034 – East Alstom Boiler (see note C)	NOx	0.0	
B035 – West Alstom Boiler (see note C)	NOx	3.5	

#### Note A: P003/P004 East & West Flare

The attached  $H_2S$  tables identify all emissions in excess of the Subpart Ja  $H_2S$  limit of 162 ppm $_V$  on a 3-hour rolling average. If an event did not occur for 3 consecutive hours, then it does not meet the 3-hour averaging requirement and therefore is not considered excess emissions. If a 3-hour event exceeds the 100,000 ppm $_V$  span limit of the  $H_2S$  CMS, then the Total Sulfur analyzer data was used for the  $H_2S$  value.

#### Note B: P007 – FCCU/CO Boiler Bypass

The purpose of these CEMS are to continuously monitor the listed (CO, NOx, & SO<sub>2</sub>) emissions from the FCCU Regenerator exhaust in the event of a CO Boiler bypass while there is feed to the FCCU. Otherwise, compliance with the listed limits for the FCCU is determined from continuous emissions monitoring of the CO Boiler Exhaust stack. Although this source is not subject to 40 CFR Part 60, Section C.12.(d)(7) of P0104782 (as set forth by Permits-to-Install 04-01290 and P0105902) requires monitoring per 40 CFR Part 60.11. As

#### CMS Summary & Data Assessment Report – 1Q2022

noted in Section C.12.(e)(4) of P0104782, the refinery has opted to follow the reporting requirements under 40 CFR 60.7. 40 CFR 60.7(c) requires the submission of an Excess Emissions and Monitoring Systems Performance Report and Summary Report Form.

Note C: B034/B035 East & West Alstom Boiler
The attached data tables include supplemental reporting for NOx CEMS records required by 40CFR49b(i).

Details of all downtime or excess emission incidents are provided in the summary tables in Attachment A.

#### <u>Data Assessment Report (Attachment B)</u>

In accordance with the terms and conditions of their permits, Attachment B includes the Continuous Emission Monitor (CEM) Data Assessment Report (DAR) for this quarter. Table 2 below is a summary of Cylinder Gas Audits conducted this quarter. Where noted in Table 2, Relative Accuracy Test Audits (RATAs) were conducted this quarter; these reports were submitted previously via Air Services.

Table 2. Cylinder Gas Audit Summary

Location/Emission Unit	Parameter	Notes
East Side Fuel Gas Mix Drum (B008, B009, B010)	H2S	RATA – No CGA
TIU Fuel Gas Mix Drum (B015, B017, B019, B022, B029, B030, B031, B032, B033, B034, B035, P007)	H₂S	RATA – No CGA
B036 - Reformer 3 Heater H2S CMS	H₂S	RATA – No CGA
P003 - East Flare	H <sub>2</sub> S	RATA – No CGA
P004 - West Flare	H <sub>2</sub> S	RATA – No CGA
P003 - East Flare (low & high ranges)	Total Sulfur	
P004 - West Flare (low & high ranges)	Total Sulfur	
TIU Fuel Gas Mix Drum (B015, B017, B019, B022, B029, B030, B031, B032, B033, B034, B035, P007)	Total Sulfur	RATA – No CGA
B036 - Reformer 3 NOx/O2 CEMS	NOx, O <sub>2</sub>	
B034 - East Alstom Boiler	NOx, O <sub>2</sub>	RATA
B035 - West Alstom Boiler	NOx, O <sub>2</sub>	RATA
P007 - FCCU/CO Boiler	SO <sub>2</sub> , NOx, CO, O <sub>2</sub>	
P007 - FCC Regen Line	SO <sub>2</sub> , NOx, CO, CO <sub>2</sub> , O <sub>2</sub>	
P009 - SRU #1	SO <sub>2</sub> , O <sub>2</sub>	
P037 - SRU #2 & #3 (TRP SRU)	SO <sub>2</sub> , O <sub>2</sub>	-

The DAR also includes out-of-control (OOC) times for the FCCU/CO Boiler CO CEMS, FCC Regen Line CO, O<sub>2</sub>, & CO<sub>2</sub> CEMS, the SRU#1 SO<sub>2</sub> & O<sub>2</sub> CEMS, and the TRP SRU SO<sub>2</sub> & O<sub>2</sub> CEMS based on the OOC requirements defined by the MACT general requirements, 40 CFR Part 63.8(c)(7).

CMS Summary & Data Assessment Report – 102022

#### CEMS calendar tons reporting

In accordance with the Title V permit, Table 3 includes calendar tons per quarter for certain pollutants for Emission units B034, B035, B036, P004, P003, and P007.

Table 3. CEMS Reporting requirement with calendar tons

Page	Citation	EU	Description	Language	Tons
				Units subject to NSPS Ja NOx monitoring - quarterly reports require "the total	
63	B.5.b)(2)b.v	B036	Reformer Heater	NOx emissions for the calendar quarter (tons)" to be included with the	
				quarterly EER for NOx CEMs	6.08
191	c.12.e)(2)b.v	P007	FCCU	Quarterly EER required for SO2 CEM requires "the total SO2 emissions for	
101	C. 12.e)(2)b.v	F 007	-000	the calendar quarter (tons)" to be included	155.53
102	c.12.e)(4)b.v	P007	FCCU	Quarterly EER required for NOx CEM requires "the total NOx emissions for	
103	C. 12.e)(4)b.v	F 00 <i>1</i>		the calendar quarter (tons)" to be included	58.91
200	c.20.e)(2)b.v	D027	SRU 2/3	Quarterly EER required for SO2 CEM requires "the total SO2 emissions for	
290	C.20.e)(2)b.v	F 031	3KU 2/3	the calendar quarter (tons)" to be included	10.58
120	c.36.e)(4)b.v	D034/D038	Alstom Boilers	Quarterly EER required for NOx CEM requires "the total NOx emissions for	
420	C.30.e)(4)b.v	D034/D030	Aistoili Boileis	the calendar quarter (tons)" to be included	7.52
105	o 40 oV5\b v	D003/D00/	East/West Flare	Quarterly EER required for H2S CEM requires "the total hydrogen sulfide	
465	C.40.e)(5)b.v	F 003/F 00 <sup>2</sup>	Easi/West Flate	emissions for the calendar quarter (tons)" to be included	0.43
407	a 40 a\/6\b \/	D003/D00/	East/West Flare	Quarterly EER required for Total Sulfur CEM requires "the total sulfur	
487	0.40.e)(6)b.V	P003/P002	Easi/west Flare	emissions for the calendar quarter (tons)" to be included	1.70

If you have any questions concerning this report, please contact Hannah Placzek (Hannah.placzek@bp.com).

Based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate, and complete.

Sincerely,

Des Gillen
90F20640AD13450...

Des Gillen

President - BP-Husky Refining LLC

Attachment A – CMS Summary Report Attachment B – Data Assessment Report

### Attachment A – CMS Summary Report

Pollutant:	$H_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Crude 1 Furnace (0448020007B015)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summary		CMS Perfomance Summary	
Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) / 3. [Total CMS Downtime] x (100) / [Total source		0.2	
[Total source operating time] % <sup>3</sup>	0.3	operating time] % <sup>3</sup>	0.2
2 Record all times in hours.  3 For the group stick and size the lift the total duration of excess emissions is		or greater of the total operating time or the total CMS downtime is	

<sup>&</sup>lt;sup>3</sup> For the reporting period:

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: H<sub>2</sub>S

**Reporting Period Dates: From:** <u>January 1, 2022</u> To: April 1, 2022

Company: **BP-Husky Refining LLC** 

**Emission Limitation:** 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

4001 Cedar Point Road, Oregon, Ohio 43616 Address:

Siemens Maxum II, SN: 009300 **Monitor Manufacturer and Model No.:** 

**Date of Latest CMS Certification or Audit:** 1/31/2022

**Process Unit(s) Description:** Coker 2 Furnace (0448020007B017)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,123 hr

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due to:		1. CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) / [Total source operating time] % <sup>3</sup>	0.3	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	0.2
	•	or greater of the total operating time or the total CMS downtime is	•

greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen Signature: Des Gillen –90F20640AD13450... President - BP-Husky Refining LLC Title: 4/26/2022 Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

**Pollutant:** H<sub>2</sub>S

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Crude Vac 2 Furnace (0448020007B019)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) / [Total source operating time] % <sup>3</sup>	0.3	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	0.2
2 Record all times in hours.  3 For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of			

d: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:
Des Gillen

Docusigned by:
Des Gillen

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: H <sub>2</sub> S	S
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**Reporting Period Dates: From:** January 1, 2022 To: April 1, 2022

**BP-Husky Refining LLC** Company:

**Emission Limitation:** 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

**Monitor Manufacturer and Model No.:** Siemens Maxum II, SN: 009300

**Date of Latest CMS Certification or Audit:** 1/31/2022

Naphtha Treater Furnace (0448020007B022) **Process Unit(s) Description:** 

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /	0.3	3. [Total CMS Downtime] x (100) / [Total source	0.2
[Total source operating time] % <sup>3</sup>	0.0	operating time] % <sup>3</sup>	0.2
2 Record all times in hours.			
	•	or greater of the total operating time or the total CMS downtime is report form and the excess emission report shall be submitted.	5 percent of

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen Des Gillen Signature: Title: President - BP-Husky Refining LLC 4/26/2022 Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant:	$H_2S$
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**Reporting Period Dates: From:** January 1, 2022 To: April 1, 2022

Company: **BP-Husky Refining LLC** 

0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average **Emission Limitation:** 

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

**Monitor Manufacturer and Model No.:** Siemens Maxum II, SN: 009300

**Date of Latest CMS Certification or Audit:** 1/31/2022

**Process Unit(s) Description:** DHT A-Train Furnace (0448020007B029)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** (TIU fuel gas was combusted for 2,159 hours and 2,159 hr

natural gas was combusted for 0 hours for a total of

2,159 hours this quarter)

Emission Data Summary		CMS Perfomance Summary	
Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /	0.3	3. [Total CMS Downtime] x (100) / [Total source	0.2
[Total source operating time] % <sup>3</sup>	0.3	operating time] % <sup>3</sup>	0.2
2 Record all times in hours.	_		
<sup>3</sup> For the reporting period: If the total duration of excess emissions i	s 1 percent	or greater of the total operating time or the total CMS downtime is	5 percent

greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
	90F20640AD13450
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: H	$_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H₂S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: BGOT Furnace (0448020007B030)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr (TIU fuel gas was combusted for 2,159 hours and

natural gas was combusted for 0 hours for a total of

2,159 hours this quarter)

Emission Data Summary		CMS Perfomance Summary	
Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /  [Total source operating time] % <sup>3</sup> 2 Record all times in hours.	0.3	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	0.2
<sup>3</sup> For the reporting period: If the total duration of excess emissions is		or greater of the total operating time or the total CMS downtime is report form and the excess emission report shall be submitted.	5 percent of

#### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:

Des Gillen

DocuSigned by:

Des Gillen

Des Gil

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: H<sub>2</sub>S

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

**Date of Latest CMS Certification or Audit:** 1/31/2022

Process Unit(s) Description: <u>Vac 1 Furnace (0448020007B031)</u>

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /	0.3	3. [Total CMS Downtime] x (100) / [Total source	0.2
[Total source operating time] % <sup>3</sup>	0.5	operating time] % <sup>3</sup>	0.2
2 Record all times in hours.			_

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

DocuSigned by:

Signature: Des Gillen

Title: President - BP-Husky Refining LLC

4/26/2022 **Date:** 

<sup>1</sup> Form described in 40 CFR 60.7 (d)

**Pollutant**: H<sub>2</sub>S

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Coker 3 Furnace (0448020007B032)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due to:		1. CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /	0.3	3. [Total CMS Downtime] x (100) / [Total source	0.2
[Total source operating time] % <sup>3</sup>	0.5	operating time] % <sup>3</sup>	0.2
2 Record all times in hours.			

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:
Des Gillen

DocuSigned by:
Des Gillen

Des Gillen

Des Gillen

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

**Pollutant:** H<sub>2</sub>S

Reporting Period Dates: From: January 1, 2022 To: March 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: East BGOT Furnace (0448020007B033)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary  1. Duration of excess emissions in reporting period due to:		CMS Perfomance Summary	
		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	6	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	6	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /	0.3	3. [Total CMS Downtime] x (100) / [Total source	0.2
[Total source operating time] % <sup>3</sup>	0.3	operating time] % <sup>3</sup>	0.2
2 Record all times in hours.	_		

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Signature: Des Gillen

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	luta	nt:	H <sub>2</sub> S

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

**Date of Latest CMS Certification or Audit:** 1/31/2022

Process Unit(s) Description: East Alstom Boiler (0448020007B034)

Source Operating Time in Reporting Period<sup>2</sup>:

2,159 hr

(TIU fuel gas was combusted for 21 hours and natural gas was combusted for 2,138 hours for a total of 2,159 hours this quarter)

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	0	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	0	2. Total CMS Downtime	0
3. Total duration of excess emissions x (100) /		3. [Total CMS Downtime] x (100) / [Total source	
[Total source operating time] % <sup>3</sup>	0.0	operating time] % <sup>3</sup>	0.0
2 Record all times in hours.			
· - · · · - · -   - · · · · · · · · · ·	•	or greater of the total operating time or the total CMS downtime is report form and the excess emission report shall be submitted.	5 percent of

Describe any changes since last quarter in CMS, process, or controls.

The West Alstom Boiler combusted a combination of natural gas and TIU Mix Drum fuel gas this quarter.

Name:	Des Gillen
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

**Pollutant**: H<sub>2</sub>S

Company:

**Reporting Period Dates:** 

c. Process Problems

e. Unknown causes

<sup>3</sup> For the reporting period:

2 Record all times in hours.

Other known causes

Total duration of excess emissions

[Total source operating time] %<sup>3</sup>

Total duration of excess emissions x (100) /

### **FIGURE 1 - SUMMARY REPORT** GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE<sup>1</sup>

**From:** <u>January 1, 2022</u>

**BP-Husky Refining LLC** 

April 1, 2022

Quality assurance calibration

3. [Total CMS Downtime] x (100) / [Total source

Other known causes

Unknown causes

**Total CMS Downtime** 

operating time] %<sup>3</sup>

If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of

5

0

5

0.2

To:

Emission Limitation:	0.10 gr H <sub>2</sub> S/dscf fuel gas on a 3-hr rolling average			
Address:	4001 Cedar Point Road, Oregon, Ohio 43616			
Monitor Manufacturer and Model No.:	Siemens Maxum II, SN: 009300			
Date of Latest CMS Certification or Audit:	1/31/2022			
Process Unit(s) Description:	West Alstom Boiler (0448020007B035)			
Total Source Operating Time in Reporting Period <sup>2</sup> :  2,159 hr (TIU fuel gas was combusted for 2,159 hours and natural gas was combusted for 0 hours for a total of 2,159 hours this quarter)				
Emission Data Summary CMS Perfomance Summary				
1. Duration of excess emissions in reporting period	due to:		1. CMS downtime in reporting period due to:	
a. Start-up/Shutdown:		0	a. Monitor equipment malfunctions	0
b. Control equipment problems		0	b. Non-monitor equipment malfunctions	0
c. Process Problems		6	c. Quality assurance calibration	0

0

0

0

0.3

d.

greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

The West Alstom Boiler combusted a combination of natural gas and TIU Mix Drum fuel gas this quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:	Des Gillen
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

Describe any changes since last quarter in CMS, process, or controls.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: H<sub>2</sub>S

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H₂S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: FCC/CO Boiler (0448020007P007)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary  1. Duration of excess emissions in reporting period due to:		CMS Perfomance Summary		
		CMS downtime in reporting period due to:		
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0	
c. Process Problems	6	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	5	
e. Unknown causes	0	e. Unknown causes	0	
Total duration of excess emissions	6	2. Total CMS Downtime	5	
3. Total duration of excess emissions x (100) / [Total source operating time] % <sup>3</sup>	0.3	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	0.2	
2 Record all times in hours.				

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:
Des Gillen

DocuSigned by:
Des Gillen

President - BP-Husky Refining LLC

4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

			BP-HUSK	Y REFIN	ING LLC	- TIU MIX DF	RUM H2S CMS F	REPORT FOR 1	ST QUARTER 202	2	
EMISSIONS UNIT ID/Description		Requirement one or both) Semi- Annual	ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	DEVIATION  DURATION  Date / Time  End		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No- If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)
B015 - Crude 1 Furnace; B019 - Crude 2 Furnace; B029 - Naphtha Treater Furnace; B029 - DHT A - Train Furnace B030 - DHT B - Train Furnace; B031 - Vac 1 Furnace; B032 - Coker 3 Furnace B033 - East BGOT Furnace; B034 - East Alstom Boiler; B035 - West Alstom Boiler; P007- FCC/CO Boiler	Yes	No	Continuous Monitoring System	1/20/2022 at 15:00 hours	1/20/2022 at 18:00 hours	CEMS excess emissions for 3 hours	Fuel gas loading was shifted between amine contactors. Amine temperature and loading was not adequate to treat the fuel gas to the required limit.	Amine circulation and steam stripping were increased to improve treating capability.	No	1/20/2022 16:50	1/21/2022 17:08
B015 - Crude 1 Furnace; B019 - Crude 2 Furnace; B029 - DHT A - Train Furnace; B029 - DHT A - Train Furnace; B030 - DHT B - Train Furnace; B031 - Vac 1 Furnace; B032 - Coker 3 Furnace B033 - East BGOT Furnace; B034 - East Alstom Boiler; B035 - West Alstom Boiler; P007- FCC/CO Boiler	Yes	No	Continuous Monitoring System	1/28/2022 at 04:00 hours	1/28/2022 at 07:00 hours	CEMS excess emissions for 3 hours	An amine exchanger leak resulted in a loss of treating capacity for refinery fuel gas.	The leaking exchanger was isolated, process rates were reduced, and additional amine was brought to the refinery to improve amine treating.	No	1/28/2022 8:26	1/28/2022 17:24
B015 - Crude 1 Furnace; B019 - Crude 2 Furnace; B029 - Naphtha Treater Furnace; B029 - DHT A - Train Furnace B030 - DHT B - Train Furnace; B031 - Vac 1 Furnace; B032 - Coker 3 Furnace B033 - East BGOT Furnace; B034 - East Alstom Boiler; B035 - West Alstom Boiler; P007- FCC/CO Boiler	Yes	No	Continuous Monitoring System	3/24/2022 at 08:00 hours	3/24/2022 at 13:00 hours	CEMS downtime for 5 hours	Changed Carrier Gas	Due to the national shortage of Helium, the analyzer carrier gas was switched from Helium to Hydrogen. The analyzer was recalibrated and returned to service following the change			

Pollutant:	Total Sulfur
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation:34.53 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616Monitor Manufacturer and Model No.:Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: <u>Crude 1 Furnace (0448020007B015)</u>

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

		CMS Perfomance Summary		
		CMS downtime in reporting period due to:		
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	17	
c. Process Problems	0	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	0	
e. Unknown causes	0	e. Unknown causes	0	
2. Total duration of excess emissions	0	2. Total CMS Downtime	25	
3. Total duration of excess emissions x (100) /	0	3. [Total CMS Downtime] x (100) / [Total source	1.2	
[Total source operating time] %3		operating time] % <sup>3</sup>	1.2	
2 Record all times in hours.				

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen Docusigned by:
Signature:	Des Gillen
	90F20640AD13450
Title:	President - BP-Husky Refining LLC
	4/26/2022
Date:	

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: Total Sulfur

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: <u>BP-Husky Refining LLC</u>

Emission Limitation:21.02 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616Monitor Manufacturer and Model No.:Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Crude Vac 2 Furnace (0448020007B019)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summary		CMS Perfomance Summary		
Duration of excess emissions in reporting period due to:		CMS downtime in reporting period due to:		
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	17	
c. Process Problems	0	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	0	
e. Unknown causes	0	e. Unknown causes	0	
2. Total duration of excess emissions	0	2. Total CMS Downtime	25	
3. Total duration of excess emissions x (100) /	0	3. [Total CMS Downtime] x (100) / [Total source	1.2	
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>	1.2	
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>	1.2	

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	— Diboos dsighedNby:
Signature:	Des Gillen
'	90F20640AD13450
Title:	President - BP-Husky Refining LLC
	4/26/2022
Date:	

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: Total Sulfur

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation:6.45 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616Monitor Manufacturer and Model No.:Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Naphtha Treater Furnace (0448020007B022)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary		
1. Duration of excess emissions in reporting period due to:		
0	a. Monitor equipment malfunctions	8
0	b. Non-monitor equipment malfunctions	17
0	c. Quality assurance calibration	0
0	d. Other known causes	0
0	e. Unknown causes	0
0	2. Total CMS Downtime	25
0	3. [Total CMS Downtime] x (100) / [Total source	1.2
0	operating time] % <sup>3</sup>	1.2
	0	0 b. Non-monitor equipment malfunctions 0 c. Quality assurance calibration 0 d. Other known causes 0 e. Unknown causes 0 2. Total CMS Downtime 3. [Total CMS Downtime] x (100) / [Total source

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:

Des Gillen

Docusigned by:

Des Gillen

Poscional State Signature:

Des Gillen

Docusigned by:

Des Gillen

Poscional State Signature:

Des Gillen

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Po	llu	tant	t: T	otal	Sulfur	r

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation:2.32 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616Monitor Manufacturer and Model No.:Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: DHT A-Train Furnace (0448020007B029)

Total Source Operating Time in Reporting Period<sup>2</sup>:

2,159 hr (TIU fuel gas was combusted for 2,159 hours and natural gas was combusted for 0 hours for a total of

2,159 hours this quarter)

Emission Data Summary  1. Duration of excess emissions in reporting period due to:		CMS Perfomance Summary		
		CMS downtime in reporting period due to:		
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	17	
c. Process Problems	0	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	0	
e. Unknown causes	0	e. Unknown causes	0	
2. Total duration of excess emissions	0	2. Total CMS Downtime	25	
3. Total duration of excess emissions x (100) /  [Total source operating time] % <sup>3</sup>	0	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	1.2	
2 Record all times in hours.	I	,	1	
i or the reperting period:	•	r greater of the total operating time or the total CMS downtime is 5	percent o	

greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:
Des Gillen
Bocusigned by:

Des Gillen
90F20640AD13450...

Title:
President - BP-Husky Refining LLC
4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant:	<b>Total Sulfur</b>
------------	---------------------

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

 Emission Limitation:
 3.86 tons SO2 per rolling 12-month period

 Address:
 4001 Cedar Point Road, Oregon, Ohio 43616

 Monitor Manufacturer and Model No.:
 Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: BGOT Furnace (0448020007B030)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr (TIU fuel gas was combusted for 2,159 hours and

natural gas was combusted for 0 hours for a total of

2,159 hours this quarter)

Emission Data Summary  1. Duration of excess emissions in reporting period due to:		
0	a. Monitor equipment malfunctions	8
0	b. Non-monitor equipment malfunctions	17
0	c. Quality assurance calibration	0
0	d. Other known causes	0
0	e. Unknown causes	0
0	2. Total CMS Downtime	25
0	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	1.2
	0 0 0	0 b. Non-monitor equipment malfunctions 0 c. Quality assurance calibration 0 d. Other known causes 0 e. Unknown causes 0 2. Total CMS Downtime 0 3. [Total CMS Downtime] x (100) / [Total source

greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Docusigned by:

Signature: Des Gillen

90F20640AD13450...

Title: President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: Total Sulfur

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

 Emission Limitation:
 11.62 tons SO2 per rolling 12-month period

 Address:
 4001 Cedar Point Road, Oregon, Ohio 43616

 Monitor Manufacturer and Model No.:
 Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Vac 1 Furnace (0448020007B031)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summary	CMS Perfomance Summary		
Duration of excess emissions in reporting period due to:	CMS downtime in reporting period due to:		
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	17
c. Process Problems	0	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	0	2. Total CMS Downtime	25
3. Total duration of excess emissions x (100) / [Total source operating time] % <sup>3</sup>		3. [Total CMS Downtime] x (100) / [Total source	1.2
		operating time] % <sup>3</sup>	1.2
2 Record all times in hours.			

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Docusigned by:

Signature: Des Gillen

90F20640AD13450...

Title: President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: Total Sulfur

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation:20.46 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616Monitor Manufacturer and Model No.:Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: Coker 3 Furnace (0448020007B032)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		
Duration of excess emissions in reporting period due to:		
0	a. Monitor equipment malfunctions	8
0	b. Non-monitor equipment malfunctions	17
0	c. Quality assurance calibration	0
0	d. Other known causes	0
0	e. Unknown causes	0
0	2. Total CMS Downtime	25
	3. [Total CMS Downtime] x (100) / [Total source	1.2
U	operating time] % <sup>3</sup>	1.2
	0 0 0 0	0 b. Non-monitor equipment malfunctions 0 c. Quality assurance calibration 0 d. Other known causes 0 e. Unknown causes 0 2. Total CMS Downtime 3. [Total CMS Downtime] x (100) / [Total source

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
Title:	90F20640AD13450 President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: Total Sulfur

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation:3.86 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616Monitor Manufacturer and Model No.:Thermo Scientific SOLA II, SN: SL-09030713

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: East BGOT Furnace (0448020007B033)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary			
Duration of excess emissions in reporting period due to:			
0	a. Monitor equipment malfunctions	8	
0	b. Non-monitor equipment malfunctions	17	
0	c. Quality assurance calibration	0	
0	d. Other known causes	0	
0	e. Unknown causes	0	
0	2. Total CMS Downtime	25	
0	3. [Total CMS Downtime] x (100) / [Total source	1.2	
U	operating time] % <sup>3</sup>	1.2	
	0	0 b. Non-monitor equipment malfunctions 0 c. Quality assurance calibration 0 d. Other known causes 0 e. Unknown causes 0 2. Total CMS Downtime 0 3. [Total CMS Downtime] x (100) / [Total source	

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
Signature:	Des Gillen
Title:	90F20640AD13450  President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: Total Sulfur Reporting Period Dates:

**Emission Limitation:** 

Company:

### FIGURE 1 - SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE<sup>1</sup>

3.86 tons SO2 per rolling 12-month period

From: January 1, 2022

**BP-Husky Refining LLC** 

To:

April 1, 2022

Address:	4001 Cedar Point Road, Oregon, Ohio 43616				
Monitor Manufacturer and Model No.:	Thermo Scientific SOLA II, SN: SL-09030713				
Date of Latest CMS Certification or Audit:	1/31/2022				
Process Unit(s) Description:	East Alstom Boiler (0448020007B034) and West Alstom Boiler (0448020007B035)				
Source Operating Time in Reporting Period <sup>2</sup> :		2,209	hr (TIU fuel gas was combusted for 2,209 hor least one of the Alstom Boilers for the qua gas was combusted for 0 hours in both Als for the quarter.)	rter. Natural	
Emission Data Summary			CMS Perfomance Summary		
1. Duration of excess emissions in reporting period	due to:		CMS downtime in reporting period due to:		
a. Start-up/Shutdown:		0	a. Monitor equipment malfunctions	8	
b. Control equipment problems		0	b. Non-monitor equipment malfunctions	17	
c. Process Problems		0	c. Quality assurance calibration	0	
d. Other known causes		0	d. Other known causes	0	
e. Unknown causes		0	e. Unknown causes	0	
2. Total duration of excess emissions		0	2. Total CMS Downtime	25	
Total duration of excess emissions x (100) /  [Total source operating time] % <sup>3</sup> 0			3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	1.1	
			reater of the total operating time or the total CMS downtime is 5 ort form and the excess emission report shall be submitted.	percent of	
Describe any changes since last quarter in CMS,  The East Alstom Boiler combusted only natural gas to a certify that the information contained in this representation.  Des Gillen  Des Gillen  Des Gillen  Des Gillen	this quarter	·.	and complete.		
Signature: Des Gillen					

4/26/2022

Title:

Date:

90F20640AD13450...

President - BP-Husky Refining LLC

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - TIU MIX DRUM TS CMS REPORT FOR 1ST QUARTER 2022										
		Requirement one or both)	ACTUAL METHOD USED		DEVIATI INFORMA	TION	PROBABLE CAUSE FOR THE	CORRECTIVE ACTIONS /	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	TO DETERMINE COMPLIANCE	DEVIATION Date / Time Start	Date / Time End	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	DEVIATION	PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No - If Yes, continue to the next column)	(If no reports were made, state "NO REPORTS" in the space below)	(If no reports were made, state "NO REPORTS" in the space below)
B015 - Crude 1 Furnace; B022 - Naphtha Treater Furnace; B029 - DHT A - Train Furnace B030 - DHT B - Train Furnace; B031 - Vac 1 Furnace; B032 - Coker 3 Furnace B033 - East BGOT Furnace; B033 - East BGOT Furnace; B034-B055 - East and West Alstom Boilers; P007- FCC/CO Boiler	Yes	No	Continuous Monitoring System	1/11/2022 at 08:00 hours	1/11/2022 at 09:00 hours	CEMS downtime for 1 hours	Recalibrate for Drift	Recalibrated and Returned Analyzer to service.			
B015 - Crude 1 Furnace; B022 - Naphtha Treater Furnace; B029 - DHT A - Train Furnace B030 - DHT B - Train Furnace; B031 - Vac 1 Furnace; B032 - Coker 3 Furnace; B032 - Coker 3 Furnace B033 - East BGOT Furnace; B034/B035 - East and West Alstom Boilers; P007- FCC/CO Boiler	Yes	No	Continuous Monitoring System	1/30/2022 at 03:00 hours	1/30/2022 at 10:00 hours	CEMS downtime for 7 hours	Analyzer Failed Daily Validation	Analyzer chamber pressure fell and went into standby. Restarted analzyer, recallibrated, and returned to service.			
B015 - Crude 1 Furnace; B022 - Naphtha Treater Furnace; B029 - DHT A - Train Furnace; B030 - DHT B - Train Furnace; B031 - DHT B - Train Furnace; B032 - Coker 3 Furnace B033 - East BGOT Furnace; B034-B035 - East and West Alstom Boilers; P007- FCC/CO Boiler	Yes	No	Continuous Monitoring System	3/3/2022 at 16:00 hours	3/4/2022 at 09:00 hours	CEMS downtime for 17 hours	CEMS Datalogger locked up resulting in irretrievable data.	CEMS Datalogger froze and did not collect data			

Pollutant: H <sub>2</sub> S
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 30028039490020

Date of Latest CMS Certification or Audit: 1/24/2022

Process Unit(s) Description: <u>Iso 2 Feed Heater (0448020007B008)</u>

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary	CMS Perfomance Summary			
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:			
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0	
c. Process Problems	0	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	5	
e. Unknown causes	0	e. Unknown causes	0	
2. Total duration of excess emissions	0	2. Total CMS Downtime	5	
3. Total duration of excess emissions x (100) /		3. [Total CMS Downtime] x (100) / [Total source	0.2	
[Total source operating time] % <sup>3</sup>	0.0	operating time] % <sup>3</sup>	0.2	

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

#### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Docusigned by:

Des Gillen

President - BP-Husky Refining LLC

Date: 4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	lutan	t: ⊢	$I_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 30028039490020

**Date of Latest CMS Certification or Audit:** 1/24/2022

Process Unit(s) Description: <u>Iso 2 Stabilizer Reboiler (0448020007B009)</u>

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,105 hr

Emission Data Summarv	CMS Perfomance Summarv			
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:			
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0	
c. Process Problems	0	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	5	
e. Unknown causes	0	e. Unknown causes	0	
2. Total duration of excess emissions	0	2. Total CMS Downtime	5	
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.2	
[Total source operating time] % <sup>3</sup>	0.0	operating time] % <sup>3</sup>	0.2	
2 Record all times in hours.				
		ent or greater of the total operating time or the total CMS downtime is nmary report form and the excess emission report shall be submitted		

### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
	90F20640AD13450
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant:	$H_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.10 gr H<sub>2</sub>S/dscf fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 30028039490020

**Date of Latest CMS Certification or Audit:** 1/24/2022

Process Unit(s) Description: <u>Iso 2 Splitter Reboiler (0448020007B010)</u>

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,015 hr

Emission Data Summary	CMS Perfomance Summary						
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:						
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0				
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0				
c. Process Problems	0	c. Quality assurance calibration	0				
d. Other known causes	0	d. Other known causes	5				
e. Unknown causes	0	e. Unknown causes	0				
2. Total duration of excess emissions	0	2. Total CMS Downtime	5				
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.2				
[Total source operating time] % <sup>3</sup>	0.0	operating time] % <sup>3</sup>	0.2				
2 Record all times in hours.							
<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.							

### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
	90F20640AD13450
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

BP-HUSKY REFINING LLC - EAST SIDE MIX DRUM H2S CMS REPORT FOR 1ST QUARTER 2022											
EMISSIONS UNIT ID/Description	Report Requirement Quarterly	ent (choose	ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	DEVIATION INFORMATION DURATION Date / Time End		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No- If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)
B008 - Iso 2 Feed Heater B009 - Iso 2 Stabilizer Reboiler B010 - Iso 2 Splitter Reboiler	Yes	No	Continuous Monitoring System	3/14/2022 at 11:00 hours	3/14/2022 at 16:00 hours	CEMS downtime for 5 hours	Changed Carrier Gas	Due to the national shortage of Helium, the analyzer carrier gas was switched from Helium to Hydrogen. The analyzer was recalibrated and returned to service following the change			

Pollutant: H <sub>2</sub> S							
Reporting Period Dates:	From:	January 1, 20	<u>22</u>	To:	April 1, 2022		
Company:	BP-Hus	P-Husky Refining LLC					
Emission Limitation:	162 ppn	nv H₂S in fuel o	as on	a 3-hr rolling	<u>average</u>		
Address:	4001 Ce	edar Point Roa	d. Orec	on. Ohio 43	616		
Monitor Manufacturer and Model No.:		s Maxum II, SN					
Date of Latest CMS Certification or Audit:	1/25/202		1. 0002	0001111000	•		
Process Unit(s) Description:		er 3 Furnace(	044803	0007R036)			
Total Source Operating Time in Reporting		2,159	hr	(Reformer	3 fuel gas was combusted for 2,159 hour mbusted for 0 hours for a total of 2,159 h		
Emission Data Summary			CMS P	erfomance	Summary		
1. Duration of excess emissions in reporting	period du	e to:	1. CN	1S downtime	in reporting period due to:		
a. Start-up/Shutdown:		0	a.	Monitor equ	ipment malfunctions	0	
b. Control equipment problems		0	b.	Non-monito	r equipment malfunctions	0	
c. Process Problems		0	C.	Quality assi	urance calibration	0	
d. Other known causes		0	d.	Other know	n causes	12	
e. Unknown causes		0	e.	Unknown ca	auses	0	
2. Total duration of excess emissions		0	2. To	tal CMS Dov	vntime	12	
3. Total duration of excess emissions x (100)  [Total source operating time] % <sup>3</sup>	1	0.0		otal CMS Dor erating time]	wntime] x (100) / [Total source % <sup>3</sup>	0.6	
. c. a.c. operang penear		•	_		al operating time or the total CMS downti rm and the excess emission report shall		
Describe any changes since last quarter in The Reformer 3 Furnace combusted a combin	· -			nd natural da	se this quarter		
			_	_	·		
I certify that the information contained in the	ııs repor	t is true, accu	rate, ai	na complete	<b>).</b>		
Name: Des Gillen							
Signature: Des Gillen							

Title:

Date:

90F20640AD13450...

4/26/2022

President - BP-Husky Refining LLC

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Polluta	ant:	$H_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 60 ppmv H<sub>2</sub>S in fuel gas on a 365-day rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 30029994471080

Date of Latest CMS Certification or Audit: 1/25/2022

Process Unit(s) Description: Reformer 3 Furnace (0448020007B036)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summarv	CMS Perfomance Summarv						
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:						
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0				
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0				
c. Process Problems	0	c. Quality assurance calibration	0				
d. Other known causes	0	d. Other known causes	12				
e. Unknown causes	0	e. Unknown causes	0				
2. Total duration of excess emissions	0	2. Total CMS Downtime	12				
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.0				
[Total source operating time] % <sup>3</sup>	operating time] % <sup>3</sup>	0.6					
<sup>2</sup> Record all times in minutes.							
<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be							

#### Describe any changes since last quarter in CMS, process, or controls.

submitted.

The Reformer 3 Furnace combusted a combination of Reformer 3 fuel gas and natural gas this quarter.

Name:	_DesuGillany:
Signature:	Des Gillen
Title:	Pnesidean134BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - REFORMER 3 FURNACE H2S CMS REPORT FOR 1ST										
	Reporting Requirement (choose one or both)  ACTUAL METHOD USED		DEVIATION INFORMATION					WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE	
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	DURATION  Date / Time End	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No - If Yes, continue to the next column)	(If no reports were made, state "NO REPORTS" in the space below)	
B036 - Reformer 3 Furnace	Yes	No	Continuous Monitoring System	3/14/2022 at 10:00 hours	3/14/2022 at 22:00 hours	CEMS downtime for 12 hours	Changed Carrier Gas	Due to the national shortage of Helium, the analyzer carrier gas was switched from Helium to Hydrogen. The analyzer was recalibrated and returned to service following the change			

Pollutant:	H <sub>2</sub> S
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Reporting Period Dates: From: <u>January 1, 2022</u> To: <u>April 1, 2022</u>

Company: BP-Husky Refining LLC

Emission Limitation: 162 ppmv H<sub>2</sub>S in fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 30050531960100

Date of Latest CMS Certification or Audit: 1/26/2022

Process Unit(s) Description: East Flare (0448020007P003)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary	CMS Perfomance Summary			
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:			
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	32	
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0	
c. Process Problems	18	c. Quality assurance calibration	0	
d. Other known causes	0	d. Other known causes	2	
e. Unknown causes	0	e. Unknown causes	0	
2. Total duration of excess emissions	18	2. Total CMS Downtime	34	
3. Total duration of excess emissions x (100) /	0.8	3. [Total CMS Downtime] x (100) / [Total source	1.6	
[Total source operating time] % <sup>3</sup>	0.0	operating time] % <sup>3</sup>	1.0	
<sup>2</sup> Record all times in minutes.			-	
i of the reporting period.		cent or greater of the total operating time or the total CMS downt th the summary report form and the excess emission report shal		

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:

Des Gillen

DocuSigned by:

Des Gillen

President - BP-Husky Refining LLC

Date:

Date:

Des Gillen

DocuSigned by:

Des Gillen

Procusional by:

President - BP-Husky Refining LLC

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

BP-HUSKY REFINING LLC - EAST FLARE H2S CMS REPORT FOR 1ST QUARTER 2022												
ı	EMISSIONS UNIT	Reporting Requirement (choose one or both)		ACTUAL METHOD	DEVIATION INFORMATION		PROBABLE CAUSE FOR THE	CORRECTIVE ACTIONS /	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE	
	ID/Description	Quarterly	Semi- Annual	USED TO DETERMINE COMPLIANCE	DEVIATION Date / Time Start	DURATION  Date / Time End	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	DEVIATION	PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No- If Yes, continue to the next column)	(If no reports were made, state "NO REPORTS" in the space below)	(If no reports were made, state "NO REPORTS" in the space below)
	P003 - East Flare	Yes	No	Continuous Monitoring System	3/15/2022 at 09:00 hours	3/15/2022 at 11:00 hours	CEMS downtime for 2 hours	Changed Carrier Gas	Due to the national shortage of Helium, the analyzer carrier gas was switched from Helium to Hydrogen. The analyzer was recalibrated and returned to service following the change			
	P003 - East Flare	Yes	No	Continuous Monitoring System	3/25/2022 at 07:00 hours	3/26/2022 at 15:00 hours	CEMS out-of-control time for 32 hours	Sample Return Line Maintainence	Sample exhaust tubing was plugged. Tubing was replaced and analyzer was calibrated and returned to service.			
	P003 - East Flare	Yes	No	Continuous Monitoring System	3/25/2022 at 23:00 hours	3/26/2022 at 09:00 hours	CEMS excess emissions for 10 hours	The FCC was shutdown due to the inadvertant activation of the Estop. Flaring associated with the shut down resulted in increased H2S emissions at the flare.	The FCC was put into hot-standby and procedures were utilized to minimize flaring.	No	3/25/2022	3/28/2022
	P003 - East Flare	Yes	No	Continuous Monitoring System	3/27/2022 at 17:00 hours	3/27/2022 at 22:00 hours	CEMS excess emissions for 5 hours	The FCC and Alky units were in the process of restarting as a part of the trip on 3/25/2022. Flare baseload was increased as a part of the start up activities and resulted in increased H2S emissions at the flare	Start up procedures were used and to minimize flaring.	No	3/25/2022	3/28/2022
	P003 - East Flare	Yes	No	Continuous Monitoring System	3/28/2022 at 00:00 hours	3/28/2022 at 03:00 hours	CEMS excess emissions for 3 hours	The FCC and Alky units were in the process of restarting as a part of the trip on 3/25/2022. Flare baseload was increased as a part of the start up activities and resulted in increased H2S emissions at the flare	Start up procedures were used and to minimize flaring.	No	3/25/2022	3/28/2022

Pollutant: Total Sulfur

Reporting Period Dates: From: <u>January 1, 2022</u> To: <u>April 1, 2022</u>

Company: BP-Husky Refining LLC

Emission Limitation: NA - Analyzer used to calculate SO<sub>2</sub> emissions

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II, SN: SL-10430115

Date of Latest CMS Certification or Audit: TS Low: 1/19/2022; TS High: 1/19/2022

Process Unit(s) Description: East Flare (0448020007P003)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary	
1. Duration of excess emissions in reporting period due	e to:	CEMS downtime in reporting period due to:	
a. Start-up/Shutdown:	NA	a. Monitor equipment malfunctions	26
b. Control equipment problems	NA	b. Non-monitor equipment malfunctions	0
c. Process Problems	NA	c. Quality assurance calibration	0
d. Other known causes	NA	d. Other known causes	26
e. Unknown causes	NA	e. Unknown causes	0
2. Total duration of excess emissions	NA	2. Total CEMS Downtime	52
3. Total duration of excess emissions x (100) /	NA	3. [Total CEMS Downtime] x (100) / [Total source	2.4
[Total source operating time] % <sup>3</sup>	INA	operating time] % <sup>3</sup>	۷.4
<sup>2</sup> People all times in minutes			

<sup>&</sup>lt;sup>2</sup> Record all times in minutes.

#### Describe any changes since last quarter in CEMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:

Des Gillen

DocuSigned by:

Des Gillen

Des Gillen

Pos Gillen

90F20640AD13450...

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

### **BP-HUSKY REFINING LLC - EAST FLARE TS CMS REPORT FOR 1ST QUARTER 2022**

EMISSIONS		orting ent (choose	ACTUAL		DEVIATION INFORMATION INFORMAT			CORRECTIVE ACTIONS /	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE
UNIT ID/Description	Quarterly	Semi- Annual	METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time	Date / Time	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No- If Yes, continue to the next column)	-	(If no reports were made, state
P003 - East Flare	Yes	No	Continuous Monitoring System	1/11/2022 at 9:00:00 hours	1/11/2022 at 10:00:00 hours	CEMS downtime for 1 hours	Recalibrate for Drift	Recalibrated and Returned Analyzer to service.	,	,	,
P003 - East Flare	Yes	No	Continuous Monitoring System	1/28/2022 at 10:00 hours	1/29/2022 at 10:00 hours	CEMS out-of-control time for 24 hours	Analyzer Failed Daily Validation	Power switch at the analyzer building was shutoff. Power was returned to the analyzer and a calibration was completed.			
P003 - East Flare	Yes	No	Continuous Monitoring System	1/31/2022 at 08:00 hours	2/1/2022 at 10:00 hours	CEMS out-of-control time for 26 hours	Analyzer Failed Daily Validation	Analyzer sample heater cell failed. Replaced the sample heater, recalibrated, and returned to service.			
P003 - East Flare	Yes	No	Continuous Monitoring System	3/25/2022 at 12:00 hours	3/25/2022 at 13:00 hours	CEMS downtime for 1 hours	Recalibrate for Drift	Recalibrated and Returned Analyzer to service.			

Pollutant:	$H_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 162 ppmv H<sub>2</sub>S in fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 30050531960400

Date of Latest CMS Certification or Audit: 1/27/2022

Process Unit(s) Description: West Flare Vent Gas (0448020007P004)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CMS Perfomance Summary	
1. Duration of excess emissions in reporting period due	to:	CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	49
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0
c. Process Problems	10	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	5
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	10	2. Total CMS Downtime	54
3. Total duration of excess emissions x (100) /	0.5	3. [Total CMS Downtime] x (100) / [Total source	2.5
[Total source operating time] % <sup>3</sup>	0.5	operating time] % <sup>3</sup>	2.0

<sup>&</sup>lt;sup>2</sup> Record all times in minutes.

#### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Des Gillen
DocuSigned by:  Des Gillen
President - BP-Husky Refining LLC
4/26/2022

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Poll	uta	nt:	$H_2S$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 162 ppmv H<sub>2</sub>S in fuel gas on a 3-hr rolling average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Siemens Maxum II, SN: 009300

Date of Latest CMS Certification or Audit: 1/31/2022

Process Unit(s) Description: West Flare C Valve (0448020007P004)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summarv		CMS Perfomance Summarv	
1. Duration of excess emissions in reporting period	due to:	1. CMS downtime in reporting period due to:	
a. Start-up/Shutdown:	NA	a. Monitor equipment malfunctions	0
b. Control equipment problems	NA	b. Non-monitor equipment malfunctions	0
c. Process Problems	NA	c. Quality assurance calibration	0
d. Other known causes	NA	d. Other known causes	5
e. Unknown causes	NA	e. Unknown causes	0
2. Total duration of excess emissions	NA	2. Total CMS Downtime	5
3. Total duration of excess emissions x (100) /	N1 A 4	3. [Total CMS Downtime] x (100) / [Total source	0.0
[Total source operating time] % <sup>3</sup>	NA <sup>4</sup>	operating time] % <sup>3</sup>	0.2
<sup>2</sup> Record all times in minutes.			<u> </u>

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

#### Describe any changes since last quarter in CMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
	90F20640AD13450
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>4</sup> Excess emissions are reported in the West Flare Vent Gas section, and are not included in this section to avoid double counting.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - WEST FLARE H2S CMS REPORT FOR 1ST QUARTER 2022											
EMICOLONIO LINIT	Reporting Requirement (choose one or both)		ACTUAL METHOD	DEVIATION INFORMATION		CORRECTIVE ACTIONS /	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE			
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	DURATION  Date / Time End	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No - If Yes, continue to the next column)	(If no reports were made, state "NO REPORTS" in the space below)	(If no reports were made, state "NO REPORTS" in the space below)	
P004 - West Flare	Yes	No	Continuous Monitoring System	1/31/2022 at 10:00 hours	1/31/2022 at 12:00 hours	CEMS downtime for 2 hours	Recalibrate for Drift	Recalibrated and Returned Analyzer to service.				
P004 - West Flare	Yes	No	Continuous Monitoring System	2/1/2022 at 09:00 hours	2/1/2022 at 10:00 hours	CEMS downtime for 1 hour	Recalibrate for Drift	Recalibrated and Returned Analyzer to service.				
P004 - West Flare	Yes	No	Continuous Monitoring System	2/20/2022 at 08:00 hours	2/22/2022 at 09:00 hours	CEMS downtime for 49 hours	Software communication failure	CEMS Software did not flag the passing morning validation. Analyzer technicians checked analyzer and recalibrated.				
P004 - West Flare	Yes	No	Continuous Monitoring System	3/22/2022 at 09:00 hours	3/22/2022 at 11:00 hours	CEMS downtime for 2 hours	Changed Carrier Gas	Due to the national shortage of Helium, the analyzer carrier gas was switched from Helium to Hydrogen. The analyzer was recallibrated and returned to service following the change				
P004 - West Flare	Yes	No	Continuous Monitoring System	3/25/2022 at 23:00 hours	3/26/2022 at 06:00 hours	CEMS excess emissions for 7 hours	The FCC was shutdown due to the inadvertant activation of the Estop. Flaring associated with the shut down resulted in increased H2S emissions at the flare.	The FCC was put into hot-standby and procedures were utilized to minimize flaring.	No	3/25/2022	3/28/2022	
P004 - West Flare	Yes	No	Continuous Monitoring System	3/27/2022 at 18:00 hours	3/27/2022 at 21:00 hours	CEMS excess emissions for 3 hours	The FCC and Alky units were in the process of restarting as a part of the trip on 3/25/2022. Flare baseload was increased as a part of the start up activities and resulted in increased H2S emissions at the flare	Start up procedures were used and to minimize flaring.	No	3/25/2022	3/28/2022	

Pollutant:	Total	Sulfur
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: NA - Analyzer used to calculate SO2 emissions

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II, SN: SL-10440115

Date of Latest CMS Certification or Audit: TS Low: 1/21/2022; TS High: 1/21/2022

Process Unit(s) Description: West Flare Vent Gas (0448020007P004)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary	
1. Duration of excess emissions in reporting period due	e to:	CEMS downtime in reporting period due to:	
a. Start-up/Shutdown:	NA	a. Monitor equipment malfunctions	32
b. Control equipment problems	NA	b. Non-monitor equipment malfunctions	0
c. Process Problems	NA	c. Quality assurance calibration	0
d. Other known causes	NA	d. Other known causes	0
e. Unknown causes	NA	e. Unknown causes	0
2. Total duration of excess emissions	NA	2. Total CEMS Downtime	32
3. Total duration of excess emissions x (100) /	NA	3. [Total CEMS Downtime] x (100) / [Total source	1.5
[Total source operating time] % <sup>3</sup>	INA	operating time] % <sup>3</sup>	1.0
<sup>2</sup> Record all times in minutes	·		

<sup>&</sup>lt;sup>2</sup> Record all times in minutes.

#### Describe any changes since last quarter in CEMS, process, or controls.

Not applicable - no changes from previous quarter.

Name:	Des Gillen
Signature:	DocuSigned by: Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Form described in 40 CFR 60.7 (d)

**Pollutant:** Total Sulfur

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: NA - Analyzer used to calculate SO2 emissions

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II, SN: SL-09030713

**Date of Latest CMS Certification or Audit:** 1/31/2022

Process Unit(s) Description: West Flare C Valve (0448020007P004)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summarv	CEMS Perfomance Summarv					
1. Duration of excess emissions in reporting period due	CEMS downtime in reporting period due to:					
a. Start-up/Shutdown:	NA	a. Monitor equipment malfunctions				
b. Control equipment problems	NA	b. Non-monitor equipment malfunctions				
c. Process Problems	NA	c. Quality assurance calibration	0			
d. Other known causes	NA	d. Other known causes	0			
e. Unknown causes	NA	e. Unknown causes	0			
2. Total duration of excess emissions	NA	2. Total CEMS Downtime	25			
3. Total duration of excess emissions x (100) /		3. [Total CEMS Downtime] x (100) / [Total source	1.0			
[Total source operating time] % <sup>3</sup>	NA	operating time] % <sup>3</sup>	1.2			

<sup>&</sup>lt;sup>2</sup> Record all times in minutes.

#### Describe any changes since last quarter in CEMS, process, or controls.

Not applicable - no changes from previous quarter.

Gillen
s Gillen
sident - BP-Husky Refining LLC
5/2022

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - WEST FLARE TS CMS REPORT FOR 1ST QUARTER 2022											
Reporting Requirement (choose one or both) ACTUAL METHOD					DEVIATION INFORMATION			CORRECTIVE ACTIONS /	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE	
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	Date / Time	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	PREVENTATIVE MEASURES TAKEN		(If no reports were made, state "NO REPORTS" in the space below)		
P004 - West Flare	Yes	No	Continuous Monitoring System	3/25/2022 at 07:00 hours	3/26/2022 at 15:00 hours	CEMS out-of-control time for 32 hours	Analyzer Failed Daily Validation	Sample line had liquid carryover. Sample line was cleared and dried before the analyzer was recalibrated and returned to service.				

Pol	lutant:	NOx
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 40 ppm<sub>vd</sub> (30-day rolling average)

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 02

Date of Latest CEMS Certification or Audit: 2/1/2022

Process Unit(s) Description: Reformer 3 Furnace (0448020007B036)

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Emission Data Summary		CEMS Perfomance Summary							
1. Duration of excess emissions in reporting period du	e to:	CEMS downtime in reporting period due to:							
a. Start-up/Shutdown	0	a. Monitor equipment malfunctions	0						
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0						
c. Process Problems	0	c. Quality assurance calibration	0						
d. Other known causes	0	d. Other known causes							
e. Unknown causes	0	e. Unknown causes	0						
2. Total duration of excess emissions	0	2. Total CEMS Downtime	0						
3. Total duration of excess emissions x (100) /	0.0	3. [Total CEMS Downtime] x (100) / [Total source	0.0						
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>							
<sup>2</sup> Record all times in minutes.									
	<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CEMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report shall be								
submitted.	<b>J</b> .	• •							

#### Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
Title:	90F20640AD13450 President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - REFORMER 3 FURNACE H2S CMS REPORT FOR 1ST											
	Reporting Requirement (choose one or both)  ACTUAL METHOD USED		ACTUAL METHOD USED	DEVIATION INFORMATION					WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE	
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	DURATION  Date / Time End	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No - If Yes, continue to the next column)	(If no reports were made, state "NO REPORTS" in the space below)		
B036 - Reformer 3 Furnace	Yes	No	Continuous Monitoring System	3/14/2022 at 10:00 hours	3/14/2022 at 22:00 hours	CEMS downtime for 12 hours	Changed Carrier Gas	Due to the national shortage of Helium, the analyzer carrier gas was switched from Helium to Hydrogen. The analyzer was recalibrated and returned to service following the change				

Pollutant: CO

**Emission Limitation:** 

# FIGURE 1 - SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE<sup>1</sup>

500 ppmv CO, db, 1-hr average

Reporting Period Dates:	From: January 1, 2022	To:	April 1, 2022
Company:	BP-Husky Refining LLC		

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB URAS 14, SN: 3.240684.3

Date of Latest CEMS Certification or Audit: 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 64 hr

Emission Data Summary		CMS Perfomance Summary							
1. Duration of excess emissions in reporting period due	to:	CMS downtime in reporting period due to:							
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0						
b. Control equipment problems	0	0 b. Non-monitor equipment malfunctions							
c. Process Problems	15	c. Quality assurance calibration							
d. Other known causes	0	d. Other known causes	0						
e. Unknown causes	0	e. Unknown causes	0						
2. Total duration of excess emissions	15	2. Total CMS Downtime	0						
3. Total duration of excess emissions x (100) /	23%	3. [Total CMS Downtime] x (100) / [Total source	0.0						
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>							
2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit and the CO Boiler bypass stack was in service.									
	<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be								

#### Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen  Docusigned by:
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

# Excess Emission and Monitoring System Performance Report FCC Exhaust Bypass Unit CEMS Report (Source # P007) 1Q2022

In accordance with the Title V Permit, written reports of excess emissions shall include the following information:

1. The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

The FCC Bypass operated for a total of 64 hours in 1Q. There were five periods of excess emissions for this CEMS. Total excess emissions from these periods exceeded 500 ppm CO on an hourly average.

Start time: 3/26/2022 at 00:00
 End time: 3/26/2022 02:00

Duration: 2 hours

Start time: 3/26/2022 at 03:00
 End time: 3/26/2022 07:00

Duration: 4 hours

Start time: 3/27/2022 at 04:00
 End time: 3/27/2022 05:00

Duration: 1 hour

Start time: 3/27/2022 at 07:00
 End time: 3/27/2022 10:00

Duration: 3 hours

• Start time: 3/27/2022 at 11:00 End time: 3/27/2022 16:00

Duration: 5 hours

2. Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

These periods of excess emissions were due to an FCC shutdown caused by the inadvertent activation of the E-stop. The unit was placed in hot standby with the flue gas directed through the FCC bypass stack which resulted in excess CO emissions. As a corrective action, torch oil was introduced to maintain temperatures in the regenerator and minimize CO emissions while the unit was in hot standby.

3. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

There were no periods of downtime while the FCC Exhaust Bypass was in operation.

			BP-HI	USKY RE	FINING	LLC - FCC F	REGEN VENT CO	CEMS REPO	ORT 1ST QUARTE	R 2022	
EMISSIONS UNIT ID/Description		Requirement ne or both) Semi- Annual	ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time	DEVIATION  INFORMAT  DURATION  Date / Time		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "No Reports" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "No Reports" in the space below)
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/26/2022 at 00:00 hours	3/26/2022 at 02:00 hours	CEMS excess emissions for 2 hours	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby, the flue gas was directed through the FCC Bypass stack which resulted in elevated CO emissions.	Torch oil was introduced in order to maintain temperatures in the regenerator while the FCC was placed in hot standby to minimize CO emissions.	,	No	No
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/26/2022 at 03:00 hours	3/26/2022 at 07:00 hours	CEMS excess emissions for 4 hours	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby, the flue gas was directed through the FCC Bypass stack which resulted in elevated CO emissions.	Torch oil was introduced in order to maintain temperatures in the regenerator while the FCC was placed in hot standby to minimize CO emissions.	No	No	No
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/27/2022 at 04:00 hours	3/27/2022 at 05:00 hours	CEMS excess emissions for 1 hour	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby, the flue gas was directed through the FCC Bypass stack which resulted in elevated CO emissions.	Torch oil was introduced in order to maintain temperatures in the regenerator while the FCC was placed in hot standby to minimize CO emissions.	No	No	No
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/27/2022 at 07:00 hours	3/27/2022 at 10:00 hours	CEMS excess emissions for 3 hours	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby, the flue gas was directed through the FCC Bypass stack which resulted in elevated CO emissions.	Torch oil was introduced in order to maintain temperatures in the regenerator while the FCC was placed in hot standby to minimize CO emissions.	No	No	No
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/27/2022 at 11:00 hours	3/27/2022 at 16:00 hours	CEMS excess emissions for 5 hours	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby, the flue gas was directed through the FCC Bypass stack which resulted in elevated CO emissions.	Torch oil was introduced in order to maintain temperatures in the regenerator while the FCC was placed in hot standby to minimize CO emissions.	No	No	No

Pollutant: N
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 58.1 ppmv NOx db @ 0% O2 (365-day rolling avg)

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2, SN: 3.240682.3

**Date of Latest CEMS Certification or Audit:** 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 64 hr

Emission Data Summarv			IS Perfomance Sumn	narv		
1. Duration of excess emissions in reporting period due to:			CMS downtime in rep	orting period due to:		
a. Start	t-up/Shutdown:	0	a. Monitor equipmer	nt malfunctions	0	
b. Cont	trol equipment problems	0	b. Non-monitor equi	pment malfunctions	0	
c. Proc	cess Problems	0	c. Quality assurance	e calibration	0	
d. Othe	er known causes	0	d. Other known caus	ses	0	
e. Unknown causes			e. Unknown causes		0	
2. Total du	ration of excess emissions	0	Total CMS Downtime		0	
3. Total du	ration of excess emissions x (100) /	0.0	[Total CMS Downtime	e] x (100) / [Total source	0.0	
[Total so	ource operating time] % <sup>3</sup>		operating time] % <sup>3</sup>			
2 Record all tim	2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit and the CO Boiler bypass stack was in service.					
<sup>3</sup> For the r	<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.					

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	lluta	nt·	NOx
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 93.4 ppmv NOx db @ 0% O2 (7-day rolling avg)

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2, SN: 3.240682.3

**Date of Latest CEMS Certification or Audit:** 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 64 hr

Emission Data Summary		CMS Perfomance Summary					
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:						
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0				
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0				
c. Process Problems	0	c. Quality assurance calibration	0				
d. Other known causes	0	d. Other known causes	0				
e. Unknown causes	0	e. Unknown causes	0				
2. Total duration of excess emissions	0	2. Total CMS Downtime	0				
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.0				
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>					
2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit an	2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit and the CO Boiler bypass stack was in service.						
<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.							

#### Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
l	90F20640AD13450
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

BP-HUSKY REFINING LLC - FCC REGEN VENT NOx CEMS REPORT 1ST QUARTER 2022											
	Reporting F (choose of Quarterly		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time Start	Date / Time	DESCRIPTION AND	THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No- If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "No Reports" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "No Reports" in the space below)
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)				No downtime	e or excess emissions d	uring this reporting quarter.		

Pol	luta	nt:	$SO_2$
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 260 ppmvd SO2 at 0% excess O2 as a rolling 7-day average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2, SN: 3.240685.3

Date of Latest CEMS Certification or Audit: 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 64 hr

Er	Emission Data Summary			CMS Perfomance Summary			
Duration of excess emissions in reporting period due to:			1.	CMS downtime in reporting period due to:			
	a. Start-up/Shutdown:	0		a. Monitor equipment malfunctions	0		
	b. Control equipment problems	0		b. Non-monitor equipment malfunctions	0		
	c. Process Problems 0			c. Quality assurance calibration	0		
d. Other known causes 0				d. Other known causes	0		
e. Unknown causes				e. Unknown causes	0		
2.	Total duration of excess emissions	0	2.	Total CEMS Downtime	0		
3.	Total duration of excess emissions x (100) /	0.0	3.	[Total CEMS Downtime] x (100) / [Total source	0.0		
	[Total source operating time] %3			operating time] % <sup>3</sup>			
	2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit ar	nd the CO Boiler by	pass sta	ck was in service.			
	<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.						

#### Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant	: SO <sub>2</sub>
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 160 ppmvd SO2 at 0% excess O2 as a rolling 365-day average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2, SN: 3.240685.3

Date of Latest CEMS Certification or Audit: 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 64 hr

Emission Data Summary		CMS Perfomance Summary			
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:				
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0		
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0		
c. Process Problems	0	c. Quality assurance calibration	0		
d. Other known causes	0	d. Other known causes	0		
e. Unknown causes	0	e. Unknown causes	0		
2. Total duration of excess emissions	0	2. Total CMS Downtime	0		
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.0		
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>			
2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit and the CO Boiler bypass stack was in service.					
<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be submitted.					

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen
Signature:	Des Gillen
Title:	90F20640AD13450  President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	luta	nt:	SO <sub>2</sub>
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**Emission Data Summary** 

Reporting Period Dates: From: <u>January 1, 2022</u> To: <u>April 1, 2022</u>

Company: BP-Husky Refining LLC

Emission Limitation: 1,020 tons SO2 per rolling 12-month period

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2, SN: 3.240685.3

**Date of Latest CEMS Certification or Audit:** 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 64 hr

1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:								
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0						
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0						
c. Process Problems	0	c. Quality assurance calibration	0						
d. Other known causes	0	d. Other known causes	0						
e. Unknown causes	0	e. Unknown causes	0						
2. Total duration of excess emissions	0	2. Total CMS Downtime	0						
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.0						
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>							
2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit are	2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit and the CO Boiler bypass stack was in service.								
	<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be								

**CMS Perfomance Summary** 

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Describe any changes since last quarter in CEMS, process, or controls.

Des Gillen
Des Gillen
90F20640AD13450  President - BP-Husky Refining LLC
4/26/2022

submitted.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	lutant:	SO <sub>2</sub>
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.92 lb SO2 per 1000 lb of fresh feed

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2, SN: 3.240685.3

Date of Latest CEMS Certification or Audit: 2/3/2022

Process Unit(s) Description: FCCU/CO Boiler Bypass, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 64 hr

Emission Data Summary		CMS Perfomance Summary								
1. Duration of excess emissions in reporting period due	to:	CMS downtime in reporting period due to:								
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0							
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0							
c. Process Problems	0	c. Quality assurance calibration	0							
d. Other known causes	0	d. Other known causes	0							
e. Unknown causes	0	e. Unknown causes	0							
2. Total duration of excess emissions	0	2. Total CMS Downtime	0							
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.0							
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>								
2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit a	2 Record all times in hours. hours of operation are defined as when FCCU feed was in the unit and the CO Boiler bypass stack was in service.									
	<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent of greater of the total operating time, both the summary report form and the excess emission report shall be									

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

DocuSigned by:

Des Gillen

President - BP-Husky Refining LLC

4/26/2022

Date:

submitted.

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - FCC REGEN VENT SO2 CEMS REPORT 1ST QUARTER 2022											
	Reporting Requirement (choose one or both)  Quarterly  Semi- Annual		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION   INFORMATION		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No- If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "No Reports" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "No Reports" in the space below)		
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)		Start End Date of Excess emissions during this reporting quarter.							

Pollutant: CO

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 500 ppmv CO, db, 1-hr average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB URAS 26, SN: 3.347698.3

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,159 hr

Emission Data Summary	CEMS Perfomance Summary					
1. Duration of excess emissions in reporting period du	e to:	1.	CEMS downtime in reporting period due to:			
a. Start-up/Shutdown:	0		a. Monitor equipment malfunctions	8		
b. Control equipment problems	0		b. Non-monitor equipment malfunctions	2		
c. Process Problems	0		c. Quality assurance calibration	0		
d. Other known causes	0		d. Other known causes	0		
e. Unknown causes	0		e. Unknown causes	0		
2. Total duration of excess emissions	0	2.	Total CEMS Downtime	10		
3. Total duration of excess emissions x (100) /	0.0	3.	Total CEMS Downtime] x (100) / [Total source	0.5		
[Total source operating time] % <sup>3</sup>			operating time] % <sup>3</sup>			
2 Record all times in hours.  3 For the reporting period: If the total duration of excess em	issions is 1 nor	cent	or greater of the total operating time or the total CMS downtime	is 5 percent		

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:
Des Gillen
Bocusigned by:

Des Gillen
90F20640AD13450...

Title:
President - BP-Husky Refining LLC
4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - FCC/CO BOILER CO CEMS REPORT 1ST QUARTER 2022											
EMISSIONS UNIT ID/Description		Requirement ne or both) Semi- Annual	ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time Start	Data / Time		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No- If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "No Reports" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "No Reports" in the space below)	
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	1/5/2022 at 09:00 hours	1/5/2022 at 11:00 hours	CEMS out-of-control time for 2 hours	Analyzer Failed Daily Validation	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas. Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.				
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	1/12/2022 at 09:00 hours	1/12/2022 at 17:00 hours	CEMS downtime for 8 hours	Sample Pump Failure	Sample pump was replaced and analyzer was recalibrated and returned to service.				

**Pollutant:** NOx

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 93.4 ppmv NOx db @ 0% O2 (7-day rolling avg)

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 106, SN: 3.340641.7

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

**Total Source Operating Time in Reporting Period<sup>2</sup>:** 2,159 hr

Er	nission Data Summary	CEMS Perfomance Summary				
1.	Duration of excess emissions in reporting period du	e to:	CEMS downtime in reporting period due to:			
	a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions 8			
	b. Control equipment problems	0	b. Non-monitor equipment malfunctions 2			
	c. Process Problems	85	c. Quality assurance calibration 0			
	d. Other known causes	0	d. Other known causes 0			
	e. Unknown causes	0	e. Unknown causes 0			
2.	Total duration of excess emissions	85	2. Total CEMS Downtime 10			
3.	Total duration of excess emissions x (100) /	3.9	3. [Total CEMS Downtime] x (100) / [Total source 0.5			
	[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>			

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen
Signature: Des Gillen
Title: President - BP-Husky Refining LLC

Date: 4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollutant: NOx

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 58.1 ppmv NOx db @ 0% O2 (365-day rolling avg)

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 106, SN: 3.340641.7

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary						
1. Duration of excess emissions in reporting period	due to:	CEMS downtime in reporting period due to:						
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8					
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	2					
c. Process Problems	85	c. Quality assurance calibration	0					
d. Other known causes	0	d. Other known causes	0					
e. Unknown causes	0	e. Unknown causes	0					
2. Total duration of excess emissions	85	2. Total CEMS Downtime	10					
3. Total duration of excess emissions x (100) /	3.9	3. [Total CEMS Downtime] x (100) / [Total source	0.5					
[Total source operating time] % <sup>3</sup> 2 Record all times in hours.		operating time] % <sup>3</sup>						
<sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent								

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:
Des Gillen

Signature:
Des Gillen

Por Gillen

90F20640AD13450...

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

# Excess Emission and Monitoring System Performance Report CO Boiler Unit CEMS Report (Source # P007) 1Q2022

In accordance with the Title V Permit, written reports of excess emissions shall include the following information:

1. The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

The CO Boiler operated for a total of 2,159 hours in 1Q. There were two periods of excess emissions for this CEMS. Total excess emissions from these periods exceeded 93.4 ppm NOX on a rolling 7-day basis.

Start time: 3/28/2022 at 12:00
 End time: 3/29/2022 11:00

Duration: 23 hours

• Start time: 3/30/2022 at 16:00 End time: 4/2/2022 06:00

Duration: 62 hours

2. Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

These periods of excess emissions were due to an FCC shutdown caused by the inadvertent activation of the E-stop. The unit was placed in hot standby with the flue gas directed through the FCC bypass stack. During this time, the CO Boiler increased firing to generate steam which resulted in excess NOX emissions. As a corrective action, the steam load was shifted to other steam generating sources to minimize impact.

3. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

There were two period of CEMS downtime for the quarter while the source was in operation and are as listed below:

• Start time: 1/5/2022 09:00 End time: 1/5/2022 11:00

Duration: 2 hours

This out-of-control period was due to the cylinder gas availability. The calibration gas was corrected, the analyzer was recalibrated and returned to service.

# Excess Emission and Monitoring System Performance Report CO Boiler Unit CEMS Report (Source # P007) 1Q2022

• Start time: 1/12/2022 09:00 End time: 1/12/2022 17:00

Duration: 8 hours

This period of downtime was due a sample pump failure. The sample pump was replaced and the analyzer was recalibrated and returned to service.

	BP-HUSKY REFINING LLC - FCC/CO BOILER NOx CEMS REPORT 1ST QUARTER 2022										
EMISSIONS UNIT ID/Description	Requirement Quarterly	orting ent (choose Semi- Annual	ACTUAL METHOD USED TO DETERMINE COMPLIANCE		DEVIATION  DURATION  Date / Time End		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "No Reports" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "No Reports" in the space below)
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	1/5/2022 at 09:00 hours	1/5/2022 at 11:00 hours	CEMS out-of-control time for 2 hours	Analyzer Failed Daily Validation	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas. Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.			
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	1/12/2022 at 09:00 hours	1/12/2022 at 17:00 hours	CEMS downtime for 8 hours	Sample Pump Failure	Sample pump was replaced and analyzer was recalibrated and returned to service.			
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/28/2022 at 12:00 hours	3/29/2022 at 11:00 hours	CEMS excess emissions for 23 hours	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby with the flue gas directed through the FCC Bypass Stack, the CO Boiler increased firing to generate steam. Increased COB firing increased NOx emissions from the CO boiler burners.	Steam load was shifted to other steam generating sources in the refinery to relieve the firing on the CO Boiler and to minimize impact.	No	No	No
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	3/30/2022 at 16:00 hours	4/2/2022 at 06:00 hours	CEMS excess emissions for 62 hours	The FCC was shutdown due to the inadvertant activation of the E-stop. While the FCC was in hot standby with the flue gas directed through the FCC Bypass Stack, the CO Boiler increased firing to generate steam. Increased COB firing increased NOx emissions from the CO boiler burners.	Steam load was shifted to other steam generating sources in the refinery to relieve the firing on the CO Boiler and to minimize impact.	No	No	No

Pollut	ant:	SO <sub>2</sub>
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 260 ppmvd SO2 at 0% excess O2 as a rolling 7-day average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 106, SN: 3.340641.7

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary	
1. Duration of excess emissions in reporting period d	ue to:	CEMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	2
c. Process Problems	0	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	0	2. Total CEMS Downtime	10
3. Total duration of excess emissions x (100) /	0.0	3. [Total CEMS Downtime] x (100) / [Total source	0.5
[Total source operating time] % <sup>3</sup> 2 Record all times in hours.		operating time] % <sup>3</sup>	
		cent or greater of the total operating time or the total CMS downtime i	

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Signature: Des Gillen

Des Gillen

Des Gillen

President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	lluta	nt:	SO <sub>2</sub>
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 160 ppmvd SO2 at 0% excess O2 as a rolling 365-day average

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 106, SN: 3.340641.7

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CE	MS Perfomance Summary	
1. Duration of excess emissions in reporting period du	e to:	1.	CEMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0		a. Monitor equipment malfunctions	8
b. Control equipment problems	0		b. Non-monitor equipment malfunctions	2
c. Process Problems	0		c. Quality assurance calibration	0
d. Other known causes	0		d. Other known causes	0
e. Unknown causes	0		e. Unknown causes	0
2. Total duration of excess emissions	0	2.	Total CEMS Downtime	10
3. Total duration of excess emissions x (100) /	0.0	3.	[Total CEMS Downtime] x (100) / [Total source	0.5
[Total source operating time] % <sup>3</sup>			operating time] % <sup>3</sup>	
2 Record all times in hours.	ii i- <b>1</b>		or greater of the total energing time or the total CMS downtime	:

<sup>&</sup>lt;sup>3</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

Name:	Des Gillen
	DocuSigned by:
Signature:	Des Gillen
	90F20640AD13450
Title:	President - BP-Husky Refining LLC
	4/26/2022
Date:	

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pollut	ant:	SO <sub>2</sub>
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation:1,020 tons SO2 per rolling 12-month periodAddress:4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 106, SN: 3.340641.7

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary	
1. Duration of excess emissions in reporting period du	ie to:	CEMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	2
c. Process Problems	0	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	0	2. Total CEMS Downtime	10
3. Total duration of excess emissions x (100) /	0.0	3. [Total CEMS Downtime] x (100) / [Total source	0.5
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>	
<sup>2</sup> Record all times in hours. <sup>3</sup> For the reporting period: If the total duration of excess en	nissions is 1 per	cent or greater of the total operating time or the total CMS downtime is	s 5 percent

or greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Docusigned by:

Des Gillen

Des Gill

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

Pol	lluta	nt:	SO <sub>2</sub>
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Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 0.92 lb SO2 per 1000 lb of fresh feed

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS 106, SN: 3.340641.7

Date of Latest CEMS Certification or Audit: 1/26/2022

Process Unit(s) Description: CO Boiler Exhaust, including FCC Regen Flue Gas, 0448020007P007

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary	
1. Duration of excess emissions in reporting period du	ie to:	CEMS downtime in reporting period due to:	
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	8
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	2
c. Process Problems	0	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	0	2. Total CEMS Downtime	10
3. Total duration of excess emissions x (100) / [Total source operating time] % <sup>3</sup>	0.0	3. [Total CEMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	0.5
Record all times in hours.  3 For the reporting period: If the total duration of excess em	nissions is 1 pe	ercent or greater of the total operating time or the total CMS downtime is 5	percent

or greater of the total operating time, both the summary report form and the excess emission report shall be submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not Applicable - No changes since the previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen

Signature: Des Gillen

DocuSigned by:
Des Gillen

90F20640AD13450...

Title: President - BP-Husky Refining LLC

4/26/2022

Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

	BP-HUSKY REFINING LLC - FCC/CO BOILER SO2 CEMS REPORT 1ST QUARTER 2022										
	(choose o	Requirement ne or both)	ACTUAL		DEVIATIO INFORMAT			CORRECTIVE	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	METHOD USED TO DETERMINE COMPLIANCE	DEVIATION Date / Time	Date / Time	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	ACTIONS / PREVENTATIVE MEASURES TAKEN	MALFUNCTION? (Yes or No- If Yes, continue to the next column)	(If no reports were made, state "No Reports" in the space below)	(If no reports were made, state "No Reports" in the space below)
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	Start 1/5/2022 at 09:00 hours	1/5/2022 at 11:00 hours	CEMS out-of-control time for 2 hours	Analyzer Failed Daily Validation	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas. Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.	Column)	Descrip	DOLONY
P007 - FCCU / CO Boiler Bypass Stack	Yes	No	Continuous Emissions Monitoring System (CEMS)	1/12/2022 at 09:00 hours	1/12/2022 at 17:00 hours	CEMS downtime for 8 hours	Sample Pump Failure	Sample pump was replaced and analyzer was recalibrated and returned to service.			

Pollutant: SO <sub>2</sub>		

Reporting Period Dates: From: January 1, 2022 To: April 1, 2022

Company: BP-Husky Refining LLC

Emission Limitation: 250 ppm SO<sub>2</sub> dry, 0% excess O<sub>2</sub> (12-hour average)

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: Ametek Model 919, SN: ZB-919SP-10541-1

Date of Latest CEMS Certification or Audit: 1/25/2022

Process Unit(s) Description: #1 Claus Sulfur Recovery Unit with SCOT Unit (0448020007P009)

**Total Source Operating Time in Reporting Period**<sup>2</sup>: 2,146 hr

Emission Data Summary		CEMS Perfomance Summary				
1. Duration of excess emissions in reporting period du	e to:	CEMS downtime in reporting period due to:				
a. Start-up/Shutdown <sup>4</sup> :	0	a. Monitor equipment malfunctions	0			
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0			
c. Process Problems	0	c. Quality assurance calibration	0			
d. Other known causes	0	d. Other known causes	0			
e. Unknown causes	0	e. Unknown causes	0			
2. Total duration of excess emissions	0	2. Total CEMS Downtime	0			
3. Total duration of excess emissions x (100) /	0.0	3. [Total CEMS Downtime] x (100) / [Total source	0.0			
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>				
<sup>2</sup> Record all times in minutes.	•					
To the reporting period:						

Describe any changes since last quarter in CEMS, process, or controls.

Not applicable - no changes from previous quarter.

submitted.

Name:	Des Gillen							
(	DocuSigned by:							
Signature:	Des Gillen							
- (	90F20640AD13450							
Title:	President - BP-Husky Refining LLC							
	4/26/2022							
Date:								

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

BP-HUSKY REFINING LLC SRU #1 SO2 CEMS REPORT FOR 1ST QUARTER 2022													
EMISSIONS UNIT	Reporting Requirement (choose one or both)		ACTUAL METHOD	DEVIATION INFORMATION				CORRECTIVE ACTIONS /	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE		
	Quarterly	Semi- Annual	USED TO DETERMINE COMPLIANCE	DEVIATION Date / Time	DURATION  Date / Time	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION		MALFUNCTION? (Yes or No - If Yes, continue to the next	(If no reports were made, state "NO REPORTS" in the space	(If no reports were made, state "NO REPORTS" in the space		
			0 " 5 ' '	Start	End	OF THE DEVIATION			column)	below)	below)		
P009 - Sulfur Recovery Unit #1	Yes	No	Continuous Emission Monitoring System (CEMS)	No downtime or excess emissions during this reporting quarter.									

# FIGURE 1 - SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE<sup>1</sup>

Pollutant: SO <sub>2</sub>				
Reporting Period Dates:	From:	January 1, 2022	To:	Δnril 1 2022

Company: BP-Husky Refining LLC

250 ppm SO<sub>2</sub> dry, 0% excess O<sub>2</sub> (12-hour average) **Emission Limitation:** 

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

**Monitor Manufacturer and Model No.:** Ametek Model 919 and WDG-V, SN: ZX-919-10814-1

**Date of Latest CEMS Certification or Audit:** 1/25/2022

**Process Unit(s) Description:** Sulfur Recovery Units # 2 & #3 with TGT #2 (0448020007P037)

Total Source Operating Time in Reporting Period<sup>2</sup>: 2,159 hr

Emission Data Summary		CEMS Perfomance Summary				
1. Duration of excess emissions in reporting period due to:		CEMS downtime in reporting period due to:				
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	59			
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0			
c. Process Problems	51	c. Quality assurance calibration	1			
d. Other known causes	0	d. Other known causes	0			
e. Unknown causes	0	e. Unknown causes	0			
2. Total duration of excess emissions	51	2. Total CEMS Downtime	60			
3. Total duration of excess emissions x (100) /	2.4	3. [Total CEMS Downtime] x (100) / [Total source	2.8			
[Total source operating time] % <sup>3</sup>		operating time] % <sup>3</sup>				
2 Record all times in hours.						
· · · · · · · · · · · · · · · · · · ·		percent or greater of the total operating time or the total CMS dow both the summary report form and the excess emission report sh				

submitted.

Describe any changes since last quarter in CEMS, process, or controls.

Not applicable - no changes from previous quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:	Des Gillen
Signature:	DocuSigned by: Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

# Excess Emission and Monitoring System Performance Report #2 and 3 Claus Sulfur Recovery Unit CEMS Report (Source # P037) 102022

In accordance with the applicable PTIs for this source, written reports of excess emissions shall include the following information:

1. The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

#2 and 3 Sulfur Recovery Units operated for a total of 2159 hours in 1Q. There was one period of excess emissions for this CEMS. Total excess emissions from these periods exceeded 250 ppm SO2 on a rolling 12 hour basis.

Start time: 1/28/2022 08:00 End time: 1/30/2022 11:00

Duration: 51 hours

2. Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

This period of excess emissions was due to a leaking amine exchanger which resulted in a loss of stripping capacity for the TRP unit. The exchanger was isolated, process rates were reduced, and additional amine was brought to the refinery to improve amine treating.

3. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

There were four periods of CEMS downtime for the quarter while the source was in operation and it is listed below:

• Start time: 1/25/2022 13:00 End time: 1/25/2022 14:00

Duration: 1 hour

This period of downtime was due to the cylinder gas audit completion. The analyzer was recalibrated and returned to service.

• Start time: 1/28/2022 07:00 End time: 1/29/2022 17:00

Duration: 34 hours

This out-of-control period was caused by a failed daily calibration. The analyzer was recalibrated and returned to service.

# Excess Emission and Monitoring System Performance Report #2 and 3 Claus Sulfur Recovery Unit CEMS Report (Source # P037) 1Q2022

• Start time: 1/30/2022 10:00 End time: 1/31/2022 09:00

Duration: 23 hours

This out-of-control period was caused by a failed daily calibration. The analyzer was recalibrated and returned to service.

• Start time: 2/3/2022 11:00 End time: 2/3/2022 13:00

Duration: 2 hours

This period of downtime was due maintenance on the sample line. Fittings were replaced and the analyzer was recalibrated and returned to service.

	BP-HUSKY REFINING LLC SRU #2 & SRU #3 SO2 CEMS REPORT FOR 1ST QUARTER 2022												
	Reporting Requirement (choose one or both		ACTUAL METHOD USED	DEVIATION INFORMATION					WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE		
EMISSIONS UNIT ID / Description	Quarterly	Semi- Annual	TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	DURATION  Date / Time End	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	PROBABLE CAUSE FOR THE CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN III		(If no reports were made, state "No Reports" in the space below)	(If no reports were made, state "No Reports" in the space below)		
P037 - Sulfur Recovery Units #2 & #3	Yes	No	Continuous Emission Monitoring System (CEMS)	1/25/2022 at 13:00 hours	1/25/2022 at 14:00 hours	CEMS downtime for 1 hours	CGA Test Completed	Recalibrated and Returned Analyzer to service.					
P037 - Sulfur Recovery Units #2 & #3	Yes	No	Continuous Emission Monitoring System (CEMS)	1/28/2022 at 07:00 hours	1/29/2022 at 17:00 hours	CEMS out-of-control time for 34 hours	Analyzer Failed Daily Validation	Recalibrated and Returned Analyzer to service.					
P037 - Sulfur Recovery Units #2 & #3	Yes	No	Continuous Emission Monitoring System (CEMS)	1/30/2022 at 10:00 hours	1/31/2022 at 09:00 hours	CEMS out-of-control time for 23 hours	Analyzer Failed Daily Validation	Recalibrated and Returned Analyzer to service.					
P037 - Sulfur Recovery Units #2 & #3	Yes	No	Continuous Emission Monitoring System (CEMS)	2/3/2022 at 11:00 hours	2/3/2022 at 13:00 hours	CEMS downtime for 2 hours	Sample Line Maintenance	Fittings on sample line were replaced. Recalibrated and returned to service.					
P037 - Sulfur Recovery Units #2 & #3	Yes	No	Continuous Emission Monitoring System (CEMS)	1/28/2022 at 08:00 hours	1/30/2022 at 11:00 hours	CEMS excess emissions for 51 hours	An amine exchanger leak resulted in a loss of stripping capacity for the TRP.	The leaking exchanger was isolated, process rates were reduced, and additional amine was brought to the refinery to improve amine treating.	No	1/28/2022	1/28/2022		

#### Additional Information Required under PTI # 04-1046

1. Total SO<sub>2</sub> emissions during calendar quarter (in tons), including any excess emissions attributed to the malfunction, startup, or shutdown of emissions unit P037. (ST&C III.A.iii)

Total SO<sub>2</sub> emissions from the TRP SRUs during the period January 1, 2022 through March 31, 2022 were calculated at 10.6 tons.

2. Total operating time of the CEMS while either SRU was online. (ST&C III.A.iii)

During the quarter, the total source operating time while either or both SRUs were in service was 2,159 hours. The CEMS was online and monitoring for 2,099 hours while either SRU was in service.

During the quarter, there were four periods of CEMS out-of-control time and two periods of CEMS downtime for a total duration of 60 hours. Details of this event are summarized in the table attached.

3. Quantification of emissions routed from the SRU to the flare beginning with activation of the relief valve until the release is over. (ST&C VII.A)

There were no periods during the 1<sup>st</sup> quarter when acid gas was sent to the TRP Acid Gas flare.

# FIGURE 1 - SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE<sup>1</sup>

Pollutant: NOx									
Reporting Period Dates:	From:	January 1	, 20	<u>22</u>		To:		<u>April 1, 2022</u>	
Company:	BP-Husl	ky Refining	LL	<u> </u>					
Address:	4001 Ce	edar Point	Roa	d, Or	egor	n, Ohio	o 4	<u>3616</u>	
Monitor Manufacturer and Model No.:	ABB LIN	MAS 11UV	and	ABB	MA	GNOS	S C	<u>)2</u>	
Monitor Location:		port on Ea					ack	c; monitor housed at ground leve	l in an
Date of Latest CMS Cert or Audit:	3/17/202	<u>22</u>							
Process Unit(s) Description:	East Als	tom Boiler	(04	4802			•		
Total Source Operating Time in Reporting	Period:	2,15	9	hr	_ wa		bus	s was combusted for 21 hours and sted for 2,138 hours for a total of 2,	•
CMS operating time while emission unit wa	as in ope	ration: _	2,1	59	hr	_			
Emission Limitation:	12.71 lb	/hr of NO <sub>x</sub>	emi	ssion	<u>s;</u>				
	38.5 ton	s/rolling 12	2-mc	nth p	erio	d of N	IO <sub>x</sub>	emissions (combined B034 & B	<u>035);</u>
	0.10 lb N	NO <sub>x</sub> (as NO	) <sub>2</sub> ) p	er m	mBtı	ı heat	in	put 30-day rolling average	
Emission Data Summary			СМ	S Pe	rfom	ance	Sı	ımmary	
1. Duration of excess emissions in reporting	period du	e to:	1.	CMS	dov	vntime	in e	reporting period due to:	
a. Start-up/Shutdown:		0		a.	Mon	itor ec	qui	oment malfunctions	0
b. Control equipment problems		0		b.	Non-	-monit	tor	equipment malfunctions	0

Emission Data Summary	CWS Performance Summary					
1. Duration of excess emissions in reporting period du	ie to:	CMS downtime in reporting period due to:				
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	0			
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0			
c. Process Problems	0	c. Quality assurance calibration	0			
d. Other known causes	0	d. Other known causes	0			
e. Unknown causes	0	e. Unknown causes	0			
Total duration of excess emissions	0	2. Total CEMS Downtime	0			
3. Total duration of excess emissions x (100) /	0.0	3. [Total CMS Downtime] x (100) / [Total source	0.0			
[Total source operating time] % <sup>3</sup> 2 Record all times in hours.		operating time] % <sup>3</sup>				
<sup>3</sup> For the reporting period: If the total duration of excess em	issions is 1	percent or greater of the total operating time or the total CMS down	time is 5			

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - No changes since last quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name:	Des Gillen Docusigned by:
Signature:	Des Gillen
Title:	President - BP-Husky Refining LLC
Date:	4/26/2022

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

#### BP-HUSKY REFINING LLC - EAST ALSTOM BOILER NOx CEMS REPORT FOR 1ST QUARTER 2022

	Reporting Requirement (choose one or both)																		ACTUAL		DEVIATIO INFORMATI		PROBABLE CAUSE	CORRECTIVE	WAS DEVIATION ATTRIBUTABLE TO A	MALFUNCTION VERBAL REPORT DATE	MALFUNCTION WRITTEN REPORT DATE
EMISSIONS UNIT ID/Description	Quarterly	Semi- Annual	METHOD USED TO DETERMINE COMPLIANCE	DEVIATION	Data / Time	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	FOR THE DEVIATION	ACTIONS /	/E MALFUNCTION? (Yes or No -		-																
B034 - Eest Alstom Boiler	Yes	No	Continuous Monitoring System				No down	ntime or excess emissio	ns during this reporting quarter.																		

#### East Alstom Boiler - 1st Quarter 2022 Db Data

NSPS Db: Supplemental Reporting for NO<sub>x</sub> CEM Records as required by 40 CFR 49b(i)

This table contains the information required by 60.49(g)(1-8).

Records for (g)(9-10) are provided in the NSPS Quarterly CEMS Report.

East Alstom Boiler (B034): 353 MMBtu/hr heater fired with refinery fuel gas and/or natural gas

Calculation Methodology: NO<sub>x</sub> emissions (lb/mmbtu) calculated from NO<sub>x</sub> CEM (ppm) using Methodology in 40 CFR 60 Appendix A Method 19 and F factor of 8710 dscf/mmbtu from Method 19 Table 19-1 when natural gas fired; site-specific F factor determined from fuel analysis when refinery fuel gas fired.

#### NSPS Limit: 0.10 lb NO<sub>2</sub>/MMBtu

	NSPS LIMIT: 0.10 ID NO <sub>x</sub> /MIMBTU										
Date	Hourly daily average NOx (lb/MMBtu)	30-day rolling average NOx (lb/MMBtu)	Excess Emissions (yes/no)	NOx Conc Exceeded CEM Span? (yes/no)	Comments: Reason for Missing or Invalid Data, or Excess Emissions						
1/1/2022	0.021	0.024	No	No							
1/2/2022	0.023	0.024	No	No							
1/3/2022	0.021	0.024	No	No							
1/4/2022	0.022	0.024	No	No							
1/5/2022	0.027	0.024	No	No							
1/6/2022	0.026	0.024	No	No							
1/7/2022	0.025	0.024	No	No							
1/8/2022	0.027	0.024	No	No							
1/9/2022	0.027	0.024	No	No							
1/10/2022	0.032	0.024	No	No							
1/11/2022	0.031	0.024	No	No							
1/12/2022	0.025	0.024	No	No							
1/13/2022	0.022	0.024	No	No							
1/14/2022	0.021	0.024	No	No							
1/15/2022	0.019	0.024	No	No							
1/16/2022	0.019	0.024	No	No							
1/17/2022	0.019	0.024	No	No							
1/18/2022	0.021	0.023	No	No							
1/19/2022	0.025	0.024	No	No							
1/20/2022	0.023	0.023	No	No							
1/21/2022	0.022	0.023	No	No							
1/22/2022	0.023	0.023	No	No							
1/23/2022	0.021	0.023	No	No							
1/24/2022	0.021	0.023	No	No							
1/25/2022	0.022	0.023	No	No							
1/26/2022	0.024	0.023	No	No							
1/27/2022	0.025	0.023	No	No							
1/28/2022	0.019	0.023	No	No							
1/29/2022	0.020	0.023	No	No							
1/30/2022	0.021	0.023	No	No							
1/31/2022	0.022	0.023	No	No							
2/1/2022	0.022	0.023	No	No							
2/2/2022	0.020	0.023	No	No							
2/3/2022	0.018	0.023	No	No							
2/4/2022	0.019	0.023	No	No							
2/5/2022	0.021	0.023	No	No							
2/6/2022	0.021	0.022	No	No							
2/7/2022	0.021	0.022	No	No							
2/8/2022	0.022	0.022	No	No							
2/9/2022	0.020	0.022	No	No							
2/10/2022	0.022	0.022	No	No							
2/11/2022	0.021	0.021	No	No							
2/12/2022	0.023	0.021	No	No							
2/13/2022	0.023	0.021	No	No							
2/14/2022	0.021	0.021	No	No							
2/15/2022	0.021	0.021	No	No							
2/16/2022	0.022	0.021	No	No							
2/17/2022	0.023	0.022	No	No							
2/18/2022	0.023	0.022	No	No							
2/19/2022	0.021	0.022	No	No							
2/20/2022	0.022	0.022	No	No							
2/21/2022	0.020	0.021	No	No							
2/22/2022	0.020	0.021	No	No							
2/23/2022	0.026	0.021	No	No							
2/24/2022	0.026	0.021	No	No							
2/25/2022	0.022	0.022	No	No							
212312022	0.019	0.0∠1	INO	INU							

Date	Hourly daily average NOx (lb/MMBtu)	30-day rolling average NOx (lb/MMBtu)	Excess Emissions (yes/no)	NOx Conc Exceeded CEM Span? (yes/no)	Comments: Reason for Missing or Invalid Data, or Excess Emissions
2/26/2022	0.022	0.021	No	No	
2/27/2022	0.023	0.021	No	No	
2/28/2022	0.020	0.021	No	No	
3/1/2022	0.021	0.021	No	No	
3/2/2022	0.020	0.021	No	No	
3/3/2022	0.021	0.021	No	No	
3/4/2022	0.022	0.021	No	No	
3/5/2022	0.022	0.021	No	No	
3/6/2022	0.021	0.022	No	No	
3/7/2022	0.021	0.022	No	No	
3/8/2022	0.021	0.022	No	No	
3/9/2022	0.023	0.022	No	No	
3/10/2022	0.022	0.022	No	No	
3/11/2022	0.023	0.022	No	No	
3/12/2022	0.022	0.022	No	No	
3/13/2022	0.023	0.022	No	No	
3/14/2022	0.023	0.022	No	No	
3/15/2022	0.021	0.022	No	No	
3/16/2022	0.024	0.022	No	No	
3/17/2022	0.024	0.022	No	No	
3/18/2022	0.019	0.022	No	No	
3/19/2022	0.020	0.022	No	No	
3/20/2022	0.019	0.022	No	No	
3/21/2022	0.018	0.021	No	No	
3/22/2022	0.021	0.021	No	No	
3/23/2022	0.020	0.021	No	No	
3/24/2022	0.018	0.021	No	No	
3/25/2022	0.019	0.021	No	No	
3/26/2022	0.022	0.021	No	No	
3/27/2022	0.021	0.021	No	No	
3/28/2022	0.021	0.021	No	No	
3/29/2022	0.023	0.021	No	No	
3/30/2022	0.023	0.021	No	No	
3/31/2022	0.023	0.021	No	No	

#### FIGURE 1 - SUMMARY REPORT GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE<sup>1</sup>

Po	llu	tant	: N	Ox
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**Reporting Period Dates: From:** <u>January 1, 2022</u> To: April 1, 2022

Company: BP-Husky Refining LLC

Address: 4001 Cedar Point Road, Oregon, Ohio 43616

Monitor Manufacturer and Model No.: ABB LIMAS 11UV and ABB MAGNOS O2

**Monitor Location:** Sample port on West Alstom Boiler Stack; monitor housed at ground level in an

analyzer building adjacent the boiler.

**Date of Latest CMS Certification or Audit:** 3/16/2022

**Process Unit(s) Description:** West Alstom Boiler (0448020007B035)

(TIU fuel gas was combusted for 2,159 hours and natural

gas was combusted for 0 hours for a total of 2,159 hours **Total Source Operating Time in Reporting Period:** 2,159 hr

this quarter) CMS operating time while emission unit was in operation: 2.084

**Emission Limitation:** 12.71 lb/hr of NO<sub>x</sub> emissions;

38.5 tons/rolling 12-month period of NO<sub>x</sub> emissions (combined B034 & B035);

0.10 lb NO<sub>x</sub> (as NO<sub>2</sub>) per mmBtu heat input 30-day rolling average

Emission Data Summary	CMS Perfomance Summary				
1. Duration of excess emissions in reporting period due	CMS downtime in reporting period due to:				
a. Start-up/Shutdown:	0	a. Monitor equipment malfunctions	75		
b. Control equipment problems	0	b. Non-monitor equipment malfunctions	0		
c. Process Problems	0	c. Quality assurance calibration	0		
d. Other known causes	0	d. Other known causes	0		
e. Unknown causes	0	e. Unknown causes	0		
2. Total duration of excess emissions	0	2. Total CEMS Downtime	75		
3. Total duration of excess emissions x (100) / [Total source operating time] % <sup>3</sup>	0.0	3. [Total CMS Downtime] x (100) / [Total source operating time] % <sup>3</sup>	3.5		
2 Record all times in hours.	ssions is 1	percent or greater of the total operating time or the total CMS dow	vntime is 5		

Describe any changes since last quarter in CMS, process, or controls.

Not applicable - No changes since last quarter.

I certify that the information contained in this report is true, accurate, and complete.

Name: Des Gillen DocuSigned by: Signature: Des Gillen -90F20640AD13450.. Title:

President - BP-Husky Refining LLC

4/26/2022 Date:

<sup>&</sup>lt;sup>1</sup> Form described in 40 CFR 60.7 (d)

BP-HUSKY REFINING LLC - WEST ALSTOM BOILER NOx CEMS REPORT FOR 1ST QUARTER 2022											
EMISSIONS UNIT ID/Description	(choose o	Requirement one or both) Semi- Annual	ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION  Date / Time  Start	Date / Time		DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)
B035 - West Alstom Boiler	Yes	No	Continuous Monitoring System	2/22/2022 at 13:00 hours	2/25/2022 at 16:00 hours	CEMS out-of-control time for 75 hours	Cylinder Gas Audit Failed	Cylinder gas audit failed. Analyzer was checked and cylinder gas audit was repeated.			

#### West Alstom Boiler - 1st Quarter 2022 Db Data

#### NSPS Db: Supplemental Reporting for NO<sub>x</sub> CEM Records as required by 40 CFR 49b(i)

This table contains the information required by 60.49(g)(1-8). Records for (g)(9-10) are provided in the NSPS Quarterly CEMS Report.

#### West Alstom Boiler (B035): 353 MMBtu/hr heater fired with refinery fuel gas and/or natural gas

Calculation Methodology: NO<sub>x</sub> emissions (lb/mmbtu) calculated from NO<sub>x</sub> CEM (ppm) using Methodology in 40 CFR 60 Appendix A Method 19 and F factor of 8710 dscf/mmbtu from Method 19 Table 19-1 when natural gas fired; site-specific F factor determined from fuel analysis when refinery fuel gas fired.

NSPS Limit: 0.10 lb NO<sub>2</sub>/MMBtu

		NSPS	Limit: 0.	10 lb NO <sub>x</sub>	/MMBtu
Date	Hourly daily average NOx (lb/MMBtu)	30-day rolling average NOx (lb/MMBtu)	Excess Emissions (yes/no)	NOx Conc Exceeded CEM Span? (yes/no)	Comments: Reason for Missing or Invalid Data, or Excess Emissions
1/1/2022	0.028	0.025	No	No	
1/2/2022	0.031	0.025	No	No	
1/3/2022	0.031	0.026	No	No	
1/4/2022	0.029	0.026	No	No	
1/5/2022	0.029	0.026	No	No	
1/6/2022	0.026	0.026	No	No	
1/7/2022	0.028	0.026	No	No	
1/8/2022	0.030	0.026	No	No	
1/9/2022	0.030	0.026	No	No	
1/10/2022	0.035	0.026	No	No	
1/11/2022	0.035	0.027	No	No	
1/12/2022	0.029	0.027	No	No	
1/13/2022	0.030	0.027	No	No	
1/14/2022	0.032	0.027	No	No	
1/15/2022	0.032	0.028	No	No	
1/16/2022	0.031	0.028	No	No	
1/17/2022	0.033	0.028	No	No	
1/18/2022	0.029	0.028	No	No	
1/19/2022	0.027	0.028	No	No	
1/20/2022	0.030	0.029	No	No	
1/21/2022	0.029	0.029	No	No	
1/22/2022	0.028	0.029	No	No	
1/23/2022	0.028	0.029	No	No	
1/24/2022	0.028	0.029	No	No	
1/25/2022	0.030	0.029	No	No	
1/26/2022	0.030	0.030	No	No	
1/27/2022	0.029	0.030	No	No	
1/28/2022	0.027	0.030	No	No	
1/29/2022	0.027	0.030	No	No	
1/30/2022	0.028	0.030	No	No	
1/31/2022	0.028	0.030	No	No	
2/1/2022	0.029	0.030	No	No	
2/2/2022	0.029	0.030	No	No	
2/3/2022	0.030	0.030	No	No	
2/4/2022	0.029	0.030	No	No	
2/5/2022	0.029	0.030	No	No	
2/6/2022	0.029	0.030	No	No	
2/7/2022	0.026	0.030	No	No	
2/8/2022	0.026	0.029	No	No	
2/9/2022	0.026	0.029	No	No	
2/10/2022	0.027	0.029	No	No	
2/11/2022	0.028	0.029	No	No	
2/12/2022	0.026	0.029	No	No	
2/13/2022	0.025	0.029	No	No	
2/14/2022	0.026	0.028	No	No	
2/15/2022	0.025	0.028	No	No	
2/16/2022	0.024	0.028	No	No	
2/17/2022	0.025	0.028	No	No	
2/18/2022	0.025	0.028	No	No	
2/19/2022	0.026	0.028	No	No	
2/20/2022	0.027	0.027	No	No	
2/21/2022	0.025	0.027	No	No	
2/22/2022	0.025	0.027	No	No	
2/23/2022	0.032	0.027	No	No	
2/24/2022	0.027	0.027	No	No	
2/25/2022	0.028	0.027	No	No	
2/26/2022	0.023	0.027	No	No	
			<u> </u>		

Date	Hourly daily average NOx (lb/MMBtu)	30-day rolling average NOx (lb/MMBtu)	Excess Emissions (yes/no)	NOx Conc Exceeded CEM Span? (yes/no)	Comments: Reason for Missing or Invalid Data, or Excess Emissions
2/27/2022	0.025	0.027	No	No	
2/28/2022	0.027	0.027	No	No	
3/1/2022	0.029	0.027	No	No	
3/2/2022	0.029	0.027	No	No	
3/3/2022	0.029	0.027	No	No	
3/4/2022	0.027	0.027	No	No	
3/5/2022	0.025	0.027	No	No	
3/6/2022	0.024	0.027	No	No	
3/7/2022	0.024	0.026	No	No	
3/8/2022	0.025	0.026	No	No	
3/9/2022	0.025	0.026	No	No	
3/10/2022	0.026	0.026	No	No	
3/11/2022	0.026	0.026	No	No	
3/12/2022	0.028	0.026	No	No	
3/13/2022	0.026	0.026	No	No	
3/14/2022	0.025	0.026	No	No	
3/15/2022	0.026	0.026	No	No	
3/16/2022	0.026	0.026	No	No	
3/17/2022	0.024	0.026	No	No	
3/18/2022	0.023	0.026	No	No	
3/19/2022	0.023	0.026	No	No	
3/20/2022	0.025	0.026	No	No	
3/21/2022	0.025	0.026	No	No	
3/22/2022	0.029	0.026	No	No	
3/23/2022	0.029	0.026	No	No	
3/24/2022	0.026	0.026	No	No	
3/25/2022	0.025	0.026	No	No	
3/26/2022	0.027	0.026	No	No	
3/27/2022	0.032	0.026	No	No	
3/28/2022	0.032	0.026	No	No	
3/29/2022	0.027	0.026	No	No	
3/30/2022	0.027	0.027	No	No	
3/31/2022	0.024	0.026	No	No	

# Attachment B – Data Assessment Report

# Data Assessment Report - East Side Fuel Gas Mix Drum H2S CMS

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

**Source unit #:** B008, B009, B010

CEMS Manufacturer: Siemens	Model #: CEMS Seri Maxim II 300280		erial #: 28039490020			
CEMS type: Hydrogen Sulf	CEMS sampling location:  East Side Fuel Gas Mix Drum					
CEMS span values as per the applicable regulation:						
	PPM				<u>Percent</u>	
SO <sub>2</sub>			O <sub>2</sub>			
<b>H₂S</b> 300			CO <sub>2</sub>			

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for:

		Vivicom	PI
1.	Date of audit:	1/24/2022	1/24/2022
2.	Reference method (RM) used:	Method 15	Method 15
3.	Average RM value:	8.8	8.8
4.	Average CEMS value:	7.2	6.8
5.	Absolute value of mean difference:	1.7	2.0
6.	Confidence coefficient:	1.260	1.275
7.	Percent relative accuracy: (based on applicable standard)	1.81	2.02

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

- B. Cylinder gas audit (CGA) for  $H_2S$  (ppm): (Not Applicable this quarter)
- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

- 1. Out-of-control periods.
  - a. Dates: None
  - b. Number of days: NA
- 2. Corrective action taken: NA
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)

# Data Assessment Report - TIU Fuel Gas Mix Drum H2S CMS

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

**Source unit #:** B015, B017, B019, B022, B029, B030, B031, B032, B033, B035,

P007

CEMS Manufacturer: Siemens	Model #: Maxim II			CEMS Serial #: 30020117999300		
CEMS type: Hydrogen Sulfide		CEMS sampling location: TIU Fuel Gas Mix Drum				
CEMS span values as	CEMS span values as per the applicable regulation:					
	<u>PPM</u>			<u>Percent</u>		
SO <sub>2</sub>	SO <sub>2</sub>					
H₂S	300	CO <sub>2</sub>				

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for:

		Vivicom	PI
1.	Date of audit:	1/31/2022	1/31/2022
2.	Reference method (RM) used:	Method 15	Method 15
3.	Average RM value:	11.3	11.2
4.	Average CEMS value:	10.2	10.0
5.	Absolute value of mean difference:	1.0	1.10
6.	Confidence coefficient:	0.862	0.853
7.	Percent relative accuracy: (based on applicable standard)	1.18	1.23

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

- B. Cylinder gas audit (CGA) for H<sub>2</sub>S (ppm): (Not Applicable this quarter)
- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

None

- 1. Out-of-control periods.
  - a. Dates:
  - b. Number of days: NA
- 2. Corrective action taken: NA
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)
- II. Calibration drift assessment See Tables B1 & B2

# Data Assessment Report - Reformer 3 Heater H<sub>2</sub>S CMS

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: B036

CEMS Manufacturer: Siemens	Model #: CEMS S Maxim II		Serial #: 30029994471080		
CEMS type: Hydrogen Sulfide	CEMS sampling location: Reformer 3 Heater Fuel Gas				
CEMS span values as per the applicable regulation:					
		<u>PPM</u>			<u>Percent</u>
SO <sub>2</sub>			O <sub>2</sub>		
H <sub>2</sub> S		300	CO <sub>2</sub>		

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for:

		Vivicom	PI
1.	Date of audit:	1/25/2022	1/25/2022
2.	Reference method (RM) used:	Method 15	Method 15
3.	Average RM value:	0.8	0.8
4.	Average CEMS value:	0.1	0.4
5.	Absolute value of mean difference:	0.7	0.5
6.	Confidence coefficient:	0.196	0.198
7.	Percent relative accuracy: (based on applicable standard)	0.53	0.40

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

- B. Cylinder gas audit (CGA) for H<sub>2</sub>S (ppm): (Not Applicable this quarter)
- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

- 1. Out-of-control periods.
  - a. Dates:

None

- b. Number of days: NA
- 2. Corrective action taken: NA
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)

# Data Assessment Report - East Flare H2S CMS

Period ending date: March 31 Year: 2022

**Company name:** BP-Husky Refining LLC **Plant name:** Toledo Refinery

Source unit #: P003

CEMS Manufacturer: Siemens		Model #: Maxim II		CEMS	S Serial #: 30050531960100
CEMS type: Hydrogen Sulfide		CEMS sampling Ea	g <i>location:</i> st Flare		
CEMS span values as per the applicable regula		tion:			
		<u>PPM</u>			<u>Percent</u>
SO <sub>2</sub>			O <sub>2</sub>		
H₂S		300	CO <sub>2</sub>		

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for:

		Vivicom	PI
1.	Date of audit:	1/26/2022	1/26/2022
2.	Reference method (RM) used:	Method 15	Method 15
3.	Average RM value:	0.9	0.9
4.	Average CEMS value:	0.3	0.3
5.	Absolute value of mean difference:	0.6	0.5
6.	Confidence coefficient:	0.182	0.232
7.	Percent relative accuracy: (based on applicable standard)	0.47	0.47

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

- B. Cylinder gas audit (CGA) for H<sub>2</sub>S (ppm): (Not Applicable this quarter)
- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

None

- 1. Out-of-control periods.
  - a. Dates:
  - b. Number of days: NA
- 2. Corrective action taken: NA
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)
- II. Calibration drift assessment See Tables B1 & B2

# Data Assessment Report - West Flare H<sub>2</sub>S CMS

Period ending date: March 31 Year: 2022

**Company name:** BP-Husky Refining LLC **Plant name:** Toledo Refinery

Source unit #: P004

CEMS Manufacturer: Model #: Siemens Maxim II			CEMS	S Serial #: 30050531960400	
CEMS type: Hydrogen Sulfide		CEMS sampling We	g location: est Flare		
CEMS span values as per the applicable regul		applicable regula	tion:		
	<u>PPM</u>				<u>Percent</u>
SO <sub>2</sub>			O <sub>2</sub>		
H <sub>2</sub> S		300	CO <sub>2</sub>		

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for:

		Vivicom	PI
1.	Date of audit:	1/27/2022	1/27/2022
2.	Reference method (RM) used:	Method 15	Method 15
3.	Average RM value:	0.8	0.8
4.	Average CEMS value:	0.8	0.8
5.	Absolute value of mean difference:	0.0	0.1
6.	Confidence coefficient:	0.255	0.320
7.	Percent relative accuracy: (based on applicable standard)	0.17	0.23

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

- B. Cylinder gas audit (CGA) for H<sub>2</sub>S (ppm): (Not Applicable this quarter)
- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

- 1. Out-of-control periods.
  - a. Dates:
- None
- b. Number of days: NA
- 2. Corrective action taken: NA
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)

# **Data Assessment Report - East Flare TS CMS**

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: P003

CEMS Manufacturer: ThermoFisher		Model #: Sola II		CEMS Serial #: SL-10430115
CEMS type: CEMS sampling Total Sulfur Eas		g <i>location:</i> st Flare		
CEMS span values as per the applicable regula		tion:		
	<u>PPM</u>			
TS (low)	3,500			
TS (high)	350,000			

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

A. Relative accuracy test audit (RATA) for: (Not Applicable)

B. Cylinder gas audit (CGA) for TS Low (ppm) and TS High (ppm):

	TS Low		TSI	High
	Audit #1	Audit #2	Audit #1	Audit #2
1. Date of audit	1/19/2022	1/19/2022	1/19/2022	1/19/2022
2. Cylinder ID number	CC427785	CC269487	CC121778	AA073391
Vendor	Airgas	Airgas	Airgas	Airgas
3. Date of certification	3/13/2019	4/27/2021	3/18/2019	3/7/2019
Expiration date	3/13/2022	4/27/2024	3/18/2027	3/7/2027
4. Type of certification	RATA Class	RATA Class	RATA Class	EPA Protocol
5. Certified audit value	884.0	1,931	87,110	192,500
6. CEMS response values	868.6	1,838	87,666	189,748
	869.7	1,828	87,647	189,282
	872.4	1,827	87,773	189,373
Average	870.2	1,831.0	87,695	189,468
7. Accuracy	-1.56%	-5.18%	0.67%	-1.58%

- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)
- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods.

a. Dates: None

b. Number of days: NA

2. Corrective action taken: NA

3. Results of audit following corrective action. (Use format of A, B, or C above.)

# **Data Assessment Report - West Flare TS CMS**

Period ending date: March 31 Year: 2022

**Company name:** BP-Husky Refining LLC **Plant name:** Toledo Refinery

Source unit #: P004

CEMS Manufacturer: ThermoFisher		Model #: Sola II		CEMS Serial #: SL-10440115
CEMS type: CEMS sampling Total Sulfur We		g location: est Flare		
CEMS span values as per the applicable regula		tion:		
	<u>PPM</u>			
TS (low)	3,500			
TS (high)		350,000		

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

A. Relative accuracy test audit (RATA) for: (Not Applicable)

B. Cylinder gas audit (CGA) for TS Low (ppm) and TS High (ppm):

	TS Low		TS High	
	Audit #1 Audit #2		Audit #1	Audit #2
1. Date of audit	1/21/2022	1/21/2022	1/21/2022	1/21/2022
2. Cylinder ID number	CC315721	CC89159	CC62361	SX28981
Vendor	Airgas	Airgas	Airgas	Airgas
3. Date of certification	3/13/2019	12/22/2020	3/18/2019	3/7/2019
Expiration date	3/13/2022	12/22/2023	3/18/2027	3/7/2027
4. Type of certification	RATA Class	RATA Class	RATA Class	RATA Class
Certified audit value	884.3	1,968.0	86,970	192,500
6. CEMS response values	900.9	1,997.1	89,510	191,756
	905.7	2,004.1	89,184	191,700
	906.2	2,013.6	89,549	191,805
Average	904.3	2,004.9	89,414	191,754
7. Accuracy	2.26%	1.88%	2.81%	-0.39%

C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods.

a. Dates: None

b. Number of days: NA

2. Corrective action taken: NA

3. Results of audit following corrective action. (Use format of A, B, or C above.)

# Data Assessment Report - TIU Fuel Gas Mix Drum TS CMS

Period ending date: March 31 Year: 2022

**Company name:** BP-Husky Refining LLC **Plant name:** Toledo Refinery

**Source unit #:** B015, B017, B019, B022, B029, B030, B031, B032, B033, B034

B035, P007

CEMS Manufacturer: ThermoFisher	Mode S	el#: Sola II	CEMS Serial #: SL-09030713	
CEMS type: Total Sulfur	CEM	CEMS sampling location: TIU Fuel Gas Mix Drum		
CEMS span values as per the applicable regulation:				
	<u>PPM</u>			
TS	<b>TS</b> 3,500			

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for:

		Vivicom	PI
1.	Date of audit:	1/31/2022	1/31/2022
2.	Reference method (RM) used:	Method 16C	Method 16C
3.	Average RM value:	106.57	106.6
4.	Average CEMS value:	94.60	92.4
5.	Absolute value of mean difference:	11.96	14.2
6.	Confidence coefficient:	4.904	5.041
7.	Percent relative accuracy: (based on applicable standard)	15.93	18.06

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

- **B.** Cylinder gas audit (CGA) for: (Not Applicable this quarter)
- **C. Relative accuracy audit (RAA) for:** (Not Applicable this quarter)
- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods.
    - a. Dates: None

- NA
- b. Number of days: Num NA
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)

# Data Assessment Report - Reformer 3 Heater NO<sub>x</sub>/O<sub>2</sub> CEM

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: B036

O <sub>2</sub> CEMS Manufacturer:			del #: IAGNOS 106	CEI	MS Serial # 3.340932.7
, .55			del #: LIMAS 11	CEI	MS Serial # 3.340287.1
CEMS sampling location	CEMS sampling location: Reformer 3 Heater stack				
CEMS span values as p	CEMS span values as per the applicable regulation:				
	PPM				<u>Percent</u>
SO <sub>2</sub>			O <sub>2</sub>		25
NO <sub>x</sub>	200		CO <sub>2</sub>		

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

A. Relative accuracy test audit (RATA) for: (Not Applicable)

B. Cylinder gas audit (CGA) for O2 (%) and NOx (ppm):

	O2 (%)		NOx (ppm)	
	Audit #1	Audit #2	Audit #1	Audit #2
1. Date of audit	2/1/2022	2/1/2022	2/1/2022	2/1/2022
2. Cylinder ID number	CC278207	BLM000740	BLM004296	LL10026
Vendor	Airgas	Airgas	Airgas	Airgas
3. Date of certification	11/20/2017	10/4/2021	6/25/2020	11/12/2019
Expiration date	11/20/2025	10/4/2029	6/25/2028	11/12/2027
4. Type of certification	RATA Class	RATA Class	RATA Class	RATA Class
5. Certified audit value	5.97	14.09	54.81	117.20
6. CEMS response values	5.96	14.00	53.73	115.71
	6.04	14.03	54.85	116.01
	6.05	14.03	54.95	115.83
Average	6.02	14.02	54.51	115.85
7. Accuracy	0.84%	-0.50%	-0.55%	-1.15%

**C.** Relative accuracy audit (RAA) for: (Not Applicable this quarter)

- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods: None
    - a. Dates:
    - b. Number of days:
  - 2. Corrective action taken:
  - 3. Results of audit following corrective action. (Use format of A, B, or C above.)
- II. Calibration drift assessment See Tables B1 & B2

# Data Assessment Report – East Alstom Boiler NO<sub>x</sub>/O<sub>2</sub> CEM

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: B034

O <sub>2</sub> CEMS Manufacturer: ABB		Model #: MAGNOS 106		MS Serial # 400003357006	
NO <sub>x</sub> CEMS Manufacturer: ABB		Model #: LIMAS 11		CEMS Serial # 00400003362206	
CEMS sampling location	CEMS sampling location: East Alstom Boiler stack				
CEMS span values as p	CEMS span values as per the applicable regulation:				
			<u>Percent</u>		
SO <sub>2</sub>		O <sub>2</sub>		20.0	
NO <sub>x</sub>	100	CO <sub>2</sub>			

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for O<sub>2</sub> (% by vol. db):

		Vivicom	PI
1.	Date of audit:	3/17/2022	3/17/2022
2.	Reference method (RM) used:	Method 3A	Method 3A
3.	Average RM value:	4.211	4.211
4.	Average CEMS value:	4.225	4.222
5.	Absolute value of mean difference:	0.014	0.011
6.	Confidence coefficient:	0.023	0.026
7.	Percent relative accuracy	0.89	0.87
	(based on RM values):	0.09	0.07

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

# Relative accuracy test audit (RATA) for NO<sub>x</sub> (ppmv db):

		Vivicom	PI
1.	Date of audit:	3/17/2022	3/17/2022
2.	Reference method (RM) used:	Method 7E	Method 7E
3.	Average RM value:	20.389	20.389
4.	Average CEMS value:	20.891	20.856
5.	Absolute value of mean difference:	.503	0.467
6.	Confidence coefficient:	0.050	0.086
7.	Percent relative accuracy	2 71	2 71
	(based on RM values):	2./ 1	2.71

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

# Relative accuracy test audit (RATA) for NO<sub>x</sub> Emission Rate (lb/MMBTU):

		Vivicom
1.	Date of audit:	3/17/2022
2.	Reference method (RM) used:	Method 7E
3.	Average RM value:	0.027
4.	Average CEMS value:	0.027
5.	Absolute value of mean difference:	0.000
6.	Confidence coefficient:	0.000
7.	Percent relative accuracy	0.0
	(based on RM values):	0.0

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

#### B. Cylinder gas audit (CGA) for O<sub>2</sub> (%):

•			
		O <sub>2</sub>	
	Audit #1	Audit #2	Audit #3
1. Date of audit	2/22/2022	2/22/2022	2/22/2022
2. Cylinder ID number	BLM005117	SG9115771ALC	CC469807
Vendor	Airgas	Airgas	Airgas
3. Date of certification	5/22/2020	11/16/2017	2/24/2020
Expiration date	5/22/2028	11/16/2025	2/24/2028
4. Type of certification	RATA Class	RATA Class	RATA Class
5. Certified audit value	5.55	11.04	17.63
6. CEMS response values	5.39	10.85	17.36
	5.41	10.85	17.36
	5.41	10.86	17.36
Average:	5.40	10.85	17.36
7. Accuracy	-2.70%	-1.72%	-1.53%

## Cylinder gas audit (CGA) for NO<sub>x</sub> (ppm):

		NOx	
	Audit #1	Audit #2	Audit #3
1. Date of audit	2/22/2022	2/22/2022	2/22/2022
2. Cylinder ID number	LL84223	SG917946CAL	CC70039
Vendor	Airgas	Airgas	Airgas
3. Date of certification	12/14/2021	6/25/2020	1/3/2022
Expiration date	12/14/2024	6/25/2028	1/3/2030
4. Type of certification	RATA Class	RATA Class	RATA Class
5. Certified audit value	25.00	54.91	91.10
6. CEMS response values	25.26	55.26	91.26
	25.60	55.72	90.98
	25.46	55.44	90.97
Average:	25.44	55.47	91.07
7. Accuracy	1.76%	1.02%	-0.03%

# **C.** Relative accuracy audit (RAA) for: (Not Applicable this quarter)

- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods. None
    - a. Dates:
    - b. Number of days:
  - 2. Corrective action taken:
  - 3. Results of audit following corrective action. (Use format of A, B, or C above.)

# Data Assessment Report – West Alstom Boiler NO<sub>x</sub>/O<sub>2</sub> CEM

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: B035

O <sub>2</sub> CEMS Manufacturer: ABB		Model #: MAGNOS 106	CEMS Serial # 00400003354606		
NO <sub>x</sub> CEMS Manufacturer: ABB		Model #: LIMAS 11		MS Serial # 100003361106	
CEMS sampling location	CEMS sampling location: West Alstom Boiler stack				
CEMS span values as per the applicable regulation:					
			<u>Percent</u>		
SO₂		0	2	20.0	
NO <sub>x</sub>	100	CC	)2		

**I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)

#### A. Relative accuracy test audit (RATA) for O<sub>2</sub> (% by vol. db):

		Vivicom	PI
1.	Date of audit:	3/16/2022	3/16/2022
2.	Reference method (RM) used:	Method 3A	Method 3A
3.	Average RM value:	3.789	3.789
4.	Average CEMS value:	3.829	3.811
5.	Absolute value of mean difference:	0.040	0.022
6.	Confidence coefficient:	0.022	0.034
7.	Percent relative accuracy	1.65	1.48
	(based on RM values):	1.05	1.40

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

#### Relative accuracy test audit (RATA) for NO<sub>x</sub> (ppmv db):

		Vivicom	PI
1.	Date of audit:	3/16/2022	3/16/2022
2.	Reference method (RM) used:	Method 7E	Method 7E
3.	Average RM value:	21.189	21.178
4.	Average CEMS value:	21.964	21.944
5.	Absolute value of mean difference:	0.776	0.767
6.	Confidence coefficient:	0.553	0.541
7.	Percent relative accuracy	6.27	6 17
	(based on RM values):	0.27	6.17

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

# Relative accuracy test audit (RATA) for NO<sub>x</sub> Emission Rate (lb/MMBtu):

		Vivicom
1.	Date of audit:	3/16/2022
2.	Reference method (RM) used:	Method 7E
3.	Average RM value:	0.028
4.	Average CEMS value:	0.028
5.	Absolute value of mean difference:	0.000
6.	Confidence coefficient:	0.001
7.	Percent relative accuracy	4.16
	(based on RM values):	4.10

8. EPA performance audit results:	Point (1)	Point (2)
a. Audit lot number		
b Audit sample number		
c. Results		
d. Actual value* (mg/dsm³)		
e. Relative error*		

<sup>\*</sup>To be completed by the Agency

A. Relative accuracy test audits (RATAs): (Not Applicable this quarter)

#### B. Cylinder gas audit (CGA) for O<sub>2</sub> (%):

	O <sub>2</sub>				
	Audit #1	Audit #2	Audit #3		
1. Date of audit	2/22/2022	2/22/2022	2/22/2022		
2. Cylinder ID number	BLM005117	SG9115771ALC	CC469807		
Vendor	Airgas	Airgas	Airgas		
3. Date of certification	5/22/2020	11/16/2017	2/24/2020		
Expiration date	5/22/2028	11/16/2025	2/24/2028		
4. Type of certification	RATA Class	RATA Class	RATA Class		
5. Certified audit value	5.514	11.04	17.63		
6. CEMS response values	5.41	10.89	17.42		
	5.42	10.90	17.43		
	5.43	10.90	17.43		
Average:	5.42	10.90	17.43		
7. Accuracy	-1.70%	-1.27%	-1.13%		

#### Cylinder gas audit (CGA) for NO<sub>x</sub> (ppm):

		NO <sub>x</sub>	
	Audit #1	Audit #2	Audit #3
1. Date of audit	2/25/2022	2/25/2022	2/25/2022
2. Cylinder ID number	LL84223	SG917946CAL	CC70039
Vendor	Airgas	Airgas	Airgas
3. Date of certification	12/14/2021	6/25/2020	1/3/2022
Expiration date	12/14/2024	6/25/2028	1/3/2030
4. Type of certification	RATA Class	RATA Class	RATA Class
5. Certified audit value	25	54.91	91.1
6. CEMS response values	25.31	55.31	90.91
	26.06	54.99	91.33
	24.76	55.51	90.44
Average:	25.38	55.27	90.89
7. Accuracy	1.52%	0.66%	-0.23%

## C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

- 1. Out-of-control periods. None
  - a. Dates:
  - b. Number of days:
- 2. Corrective action taken:
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)

# Data Assessment Report – FCC/CO Boiler SO<sub>2</sub>/NO<sub>x</sub>/CO/O<sub>2</sub> CEM

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: P007

O <sub>2</sub> CEMS Manufacturer: ABB		Model #: Magnos 106		CEI	MS Serial # 3.340569.7	
SO <sub>2</sub> CEMS Manufacturer: ABB		Model #: Limas 11 UV		CEMS Serial # 3.340641.7		
NO <sub>x</sub> CEMS Manufacture	r:		del #:	CEI	CEMS Serial #	
ABB		Limas 11 UV	3.340641.7			
CO CEMS Manufacturer	•	Model #:		CEMS Serial #		
ABB Automation		URAS- 26		3.347698.3		
CEMS sampling location	: CO Boiler stack					
CEMS span values as po	er the applicable regu	ulatio	n:			
SO <sub>2</sub>	400 PPM		O <sub>2</sub>		10.0 %	
NO <sub>x</sub>	350 PPM		со		1000 PPM	

- **I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)
  - A. Relative accuracy test audits (RATAs): (Not Applicable this quarter)
  - B. Cylinder gas audit (CGA) for  $O_2$  (%) and  $SO_2$  (ppm):

	O <sub>2</sub> (percent)		SO <sub>2</sub> (	(ppm)	
	Audit #1	Audit #2	Audit #1	Audit #2	
1. Date of audit	1/26/2022	1/26/2022	1/26/2022	1/26/2022	
2. Cylinder ID number	ALM001730	CC423357	ALM001730	CC423357	
Vendor	Airgas	Airgas	Airgas	Airgas	
3. Date of certification	2/14/2017	2/14/2017	2/14/2017	2/14/2017	
Expiration date	2/14/2025	2/14/2025	2/14/2025	2/14/2025	
4. Type of certification	RATA Class	RATA Class	RATA Class	RATA Class	
5. Certified audit value	2.49	5.53	98.98	219.40	
6. CEMS response values	2.52	5.52	92.73	215.57	
	2.52	5.52	97.60	218.86	
	2.52	5.52	98.68	220.02	
Average	2.52	5.52	96.34	218.15	
7. Accuracy	1.20%	-0.18%	-2.67%	-0.57%	

#### B. Cylinder gas audit (CGA) for NO<sub>x</sub> (ppm) and CO (ppm):

	NO <sub>x</sub> (ppm)		CO (	ppm)
	Audit #1	Audit #2	Audit #1	Audit #2
1. Date of audit	1/26/2022	1/26/2022	1/26/2022	1/26/2022
2. Cylinder ID number	XC030834B	CC222300	XC030834B	CC222300
Vendor	Airgas	Airgas	Airgas	Airgas
3. Date of certification	2/14/2017	2/14/2017	2/14/2017	2/14/2017
Expiration date	2/14/2025	2/14/2025	2/14/2025	2/14/2025
4. Type of certification	RATA Class	RATA Class	RATA Class	RATA Class
5. Certified audit value	80.86	187.80	249.50	551.00
6. CEMS response values	77.76	183.95	250.77	552.98
	79.44	184.17	251.49	553.52
	79.63	183.89	251.65	553.90
Average	78.94	184.00	251.30	553.47
7. Accuracy	-2.37%	-2.02%	0.72%	0.45%

- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)
- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods. None
    - a. Dates:
    - b. Number of days:
  - 2. Corrective action taken:
  - 3. Results of audit following corrective action. (Use format of A, B, or C above.)
- II. Calibration drift assessment See Tables B1 & B2

# Data Assessment Report - FCC Regen Line SO<sub>2</sub>/NO<sub>x</sub>/CO/O<sub>2</sub>/CO<sub>2</sub> CEM

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: P007

SO <sub>2</sub> CEMS Manufacture ABB	O <sub>2</sub> CEMS Manufacturer: ABB		Model #: Limas 11 UV		CEMS Serial # 3.240685.3	
NO <sub>x</sub> CEMS Manufacture ABB	NO <sub>x</sub> CEMS Manufacturer: ABB		Model #: Limas 11 UV		MS Serial # 3.240682.3	
CO CEMS Manufacturer ABB	CO CEMS Manufacturer: ABB		Model #: URAS 14		MS Serial # 3.240684.3	
O <sub>2</sub> CEMS Manufacturer:		Мо	del #:	CE	MS Serial #	
ABB	ABB		Magnos 206		01400101195301	
CO <sub>2</sub> CEMS Manufacture ABB	CO <sub>2</sub> CEMS Manufacturer: ABB		Model #: Limas 11 UV		CEMS Serial # 3.240682.3	
CEMS sampling location	: FCC Regen Line s	tack				
CEMS span values as p	er the applicable regu	ulatic	on:			
SO <sub>2</sub>	500 PPM		O <sub>2</sub>		25.0 %	
NOx	200 PPM		со		1000 PPM	
CO <sub>2</sub>	50.0 %					

- **I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)
  - A. Relative accuracy test audit (RATA): (Not applicable this quarter)
  - B. Cylinder gas audit (CGA) for O<sub>2</sub> (%) and SO<sub>2</sub> (ppm):

	O <sub>2</sub> (pe	ercent)	SO <sub>2</sub> (ppm)		
	Audit #1	Audit #2	Audit #1	Audit #2	
1. Date of audit	2/3/2022	2/3/2022	2/3/2022	2/3/2022	
2. Cylinder ID number	XL001104B	BLM004046	CC443275	CC82139	
Vendor	Airgas	Scott	Airgas	Airgas	
3. Date of certification	11/20/2017	11/19/2015	11/21/2017	11/21/2017	
Expiration date	11/20/2025	11/20/2023	11/21/2025	11/21/2025	
4. Type of certification	RATA Class	RATA Class	RATA Class	RATA Class	
5. Certified audit value	5.49	13.90	130.70	267.60	
6. CEMS response values	5.60	13.93	132.33	275.23	
	5.45	14.05	135.25	277.21	
	5.44	14.08	136.12	278.09	
Average	5.50	14.02	134.57	276.84	
7. Accuracy	0.18%	0.86%	2.96%	3.45%	

#### B. Cylinder gas audit (CGA) for NO<sub>x</sub> (ppm) and CO (ppm):

	NO <sub>x</sub> (	(ppm)	CO (ppm)		
	Audit #1	Audit #2	Audit #1	Audit #2	
1. Date of audit	2/3/2022	2/3/2022	2/3/2022	2/3/2022	
2. Cylinder ID number	LL34302	BAL3120	XL002639B	BLM004600	
Vendor	Airgas	Air Liquide	Airgas	Airgas	
	11/21/2017	8/12/2014	11/6/2017	10/27/2021	
<ol><li>Date of certification</li></ol>					
Expiration date	11/21/2025	8/13/2022	11/6/2025	10/27/2029	
4. Type of certification	RATA Class	RATA Class	RATA Class	RATA Class	
5. Certified audit value	54.90	116.00	277.60	547.50	
6. CEMS response values	55.77	116.41	280.49	542.59	
	56.83	116.45	280.74	542.98	
	56.95	116.86	280.98	543.02	
Average	56.52	116.57	280.74	542.86	
7. Accuracy	2.95%	0.49%	1.13%	-0.85%	

## B. Cylinder gas audit (CGA) for CO<sub>2</sub> (ppm):

	CO <sub>2</sub>	ppm)
	Audit #1	Audit #2
1. Date of audit	2/3/2022	2/3/2022
2. Cylinder ID number	ALM063125	CC472694
Vendor	Scott	Scott
3. Date of certification	9/24/2018	9/24/2018
Expiration date	9/24/2026	9/24/2026
4. Type of certification	RATA Class	RATA Class
5. Certified audit value	13.11	27.20
6. CEMS response values	13.47	27.29
	13.57	27.35
	13.61	27.38
Average	13.55	27.34
7. Accuracy	3.36%	0.51%

## C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)

#### D. Corrective action for excessive inaccuracy.

- 1. Out-of-control periods. None
  - a. Dates:
  - b. Number of days:
- 2. Corrective action taken:
- 3. Results of audit following corrective action. (Use format of A, B, or C above.)

## Data Assessment Report – Sulfur Recovery Unit (SRU #1) SO<sub>2</sub>/O<sub>2</sub> CEM

Period ending date: March 31 Year: 2022

Company name: BP-Husky Refining LLC Plant name: Toledo Refinery

Source unit #: P009

SO <sub>2</sub> CEMS Manufactur	er:	Model #:		CEMS S	erial #:
Ametek		919	9		ZB-919SP-10541-1
O <sub>2</sub> CEMS Manufacture	r:	Model #:		CEMS S	erial #:
Ametek		919	9		ZB-919SP-10541-1
CEMS sampling location	n: SRU Therm	al Oxidizer			
CEMS span values as per the applicable regulation:					
	PPM	<u>1</u>			<u>Percent</u>
SO <sub>2</sub>	500		O <sub>2</sub>		10.0
NO <sub>x</sub>			со	2	

- I. Accuracy assessment results (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)
  - A. Relative accuracy test audits (RATAs): (Not Applicable this quarter)
  - B. Cylinder gas audit (CGA) for O<sub>2</sub> (%) and SO<sub>2</sub> (ppm):

	O <sub>2</sub> pe	ercent	SO₂ ppm		
	Audit #1	Audit #2	Audit #1	Audit #2	
1. Date of audit	1/25/2022	1/25/2022	1/25/2022	1/25/2022	
2. Cylinder ID number	ALM028323	CC13867	XC006260B	ALM004131	
Vendor	Airgas	Airgas	Airgas	Airgas	
3. Date of certification	9/13/2016	11/20/2017	2/24/2017	2/14/2017	
Expiration date	9/13/2024	11/20/2025	2/24/2025	2/14/2025	
Type of certification	RATA Class	RATA Class	RATA Class	EPA Protocol	
Certified audit value	2.52	5.98	124.00	268.70	
6. CEMS response values	2.57	5.97	128.45	270.82	
	2.58	5.98	129.36	275.25	
	2.57	5.98	129.97	275.55	
Average	2.57	5.98	129.26	273.87	
7. Accuracy	1.98%	0.00%	4.24%	1.92%	

- **C. Relative accuracy audit (RAA) for:** (Not Applicable this quarter)
- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods.
    - a. Dates:
    - b. Number of days:

  - Corrective action taken:
     Results of audit following corrective action. (Use format of A, B, or C above.)
- II. Calibration drift assessment See Tables B1 & B2

# Data Assessment Report – Sulfur Recovery Unit #2 and #3 (TRP SRU) SO<sub>2</sub>/O<sub>2</sub> CEM

**Period ending date:** March 31 Year: 2022

**Company name:** BP-Husky Refining LLC **Plant name:** Toledo Refinery

Source unit #: P037

SO <sub>2</sub> CEMS Manufactu Ametek	turer: Model #: 919			CEMS Serial #: ZX-919-1	
O <sub>2</sub> CEMS Manufacture Ametek				CEMS Serial #: ZX-919-10814-1	
CEMS sampling location	EMS sampling location: TGT #2 Thermal Oxidizer stack				
CEMS span values as	CEMS span values as per the applicable regulation:				
	<u>PPM</u>				<u>Percent</u>
SO <sub>2</sub>	500			O <sub>2</sub>	10.0
NO <sub>x</sub>	-			CO <sub>2</sub>	

- **I.** <u>Accuracy assessment results</u> (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.)
  - A. Relative accuracy test audits (RATAs): (Not Applicable this quarter)
  - B. Cylinder gas audit (CGA) for O<sub>2</sub> (%) and SO<sub>2</sub> (ppm):

	O <sub>2</sub> pe	ercent	SO₂ ppm			
	Audit #1	Audit #2	Audit #1	Audit #2		
1. Date of audit	1/25/2022	1/25/2022	1/25/2022	1/25/2022		
2. Cylinder ID number	ALM028323	CC13867	XC006260B	ALM004131		
Vendor	Airgas	Airgas	Airgas	Airgas		
3. Date of certification	9/13/2016	11/20/2017	2/24/2017	2/14/2017		
Expiration date	9/13/2024	11/20/2025	2/24/2025	2/14/2025		
4. Type of certification	RATA Class	RATA Class	RATA Class	EPA Protocol		
5. Certified audit value	2.52	5.98	124.00	268.70		
6. CEMS response values	2.47	5.96	120.51	262.73		
	2.48	5.96	124.33	263.95		
	2.49	5.96	124.33	265.02		
Average	2.48	5.96	123.06	263.90		
7. Accuracy	-1.59%	-0.33%	-0.76%	-1.79%		

- C. Relative accuracy audit (RAA) for: (Not Applicable this quarter)
- D. Corrective action for excessive inaccuracy.
  - 1. Out-of-control periods.
    - a. Dates:
    - b. Number of days:
  - 2. Corrective action taken:
  - 3. Results of audit following corrective action. (Use format of A, B, or C above.)
- II. Calibration drift assessment See Tables B1 & B2

Table B1 - Calibration Drift Assessment; Out-of-Control Periods for Part 60

CEMS	Start Time	End Time	Hours	Corrective Action Taken
COB CO	1/5/2022 9:00	1/5/2022 11:00	2	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas. Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.
COB NOx	1/5/2022 9:00	1/5/2022 11:00	2	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas. Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.
COB SO2	1/5/2022 9:00	1/5/2022 11:00	2	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas. Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.
TRP SO2	1/28/2022 7:00	1/29/2022 17:00	34	Recalibrated and Returned Analyzer to service.
TRP SO2	1/30/2022 10:00	1/31/2022 9:00	23	Recalibrated and Returned Analyzer to service.
EF TS	1/28/2022 10:00	1/29/2022 10:00	24	Power switch at the analyzer building was shutoff. Power was returned to the analyzer and a calibration was completed.
EF TS	1/31/2022 8:00	2/1/2022 10:00	26	Analyzer sample heater cell failed. Replaced the sample heater, recalibrated, and returned to service.
WF TS	3/25/2022 7:00	3/26/2022 15:00	32	Sample line had liquid carryover. Sample line was cleared and dried before the analyzer was recalibrated and returned to service.
EF H2S	3/25/2022 7:00	3/26/2022 15:00	32	Sample exhaust tubing was plugged. Tubing was replaced and analyzer was calibrated and returned to service.

Table B2 – Calibration Drift Assessment; Out-of-Control Periods for Part 63

CEMS	Start Time	End Time	Hours	Corrective Action Taken
COB CO	1/5/2022 9:00	1/5/2022 11:00	2	Cylinder gas was not available for calibration. A two hour grace period is considered for the daily validation issue on the basis that the validation was missed due to an issue with the calibration gas.  Time outside of the grace period is considered OOC. Corrected calibration gas issue, recalibrated, and returned to service.
TRP SO2	1/28/2022 7:00	1/29/2022 17:00	34	Recalibrated and Returned Analyzer to service.
TRP SO2	1/30/2022 7:00	1/30/2022 10:00	3	Recalibrated and Returned Analyzer to service.
TRP SO2	1/30/2022 10:00	1/31/2022 9:00	23	Recalibrated and Returned Analyzer to service.
TRP SO2	2/2/2022 7:00	2/2/2022 9:00	2	Recalibrated and Returned Analyzer to service.
TRP SO2	2/1/2022 7:00	2/1/2022 9:00	2	Recalibrated and Returned Analyzer to service.

Per 40 CFR Part 63.8(c)(7)(i), a CMS is out of control if the zero, mid-level, or high-level calibration drift (CD) exceeds two times the applicable CD specification in the applicable performance specification or in the relevant standard. These instances are reported in Table B2 above.